

OPUS2

Manchester Arena Inquiry

Day 102

May 12, 2021

Opus 2 - Official Court Reporters

Phone: +44 (0)20 3008 5900

Email: transcripts@opus2.com

Website: <https://www.opus2.com>

Wednesday, 12 May 2021

1
2 (9.30 am)
3 (Delay in proceedings)
4 (9.36 am)
5 MR DE LA POER: Sir, good morning. May we begin by having
6 the witness sworn.
7 PC PAUL LAWTON (sworn)
8 Questions from MR DE LA POER
9 MR DE LA POER: Please could you give us your full name and
10 rank.
11 A. Paul Lawton. I'm the rank of constable.
12 Q. Is it right that you joined GMP in July of 2001?
13 A. It is, sir.
14 Q. In 2006, did you begin training as an authorised
15 firearms officer or AFO?
16 A. I did.
17 Q. Did that training involve a seven-week course?
18 A. At the time it was a seven-week course, yes.
19 Q. And how long after you had completed the course were you
20 a qualified AFO? Was it right at the end or was there
21 further training after that course?
22 A. You qualify at the end of the course to be a qualified
23 AFO, operationally competent, but you have continual
24 training throughout your firearms career.
25 Q. So by the time we got to May of 2017, you had had over

1

1 a decade of experience as a qualified AFO?
2 A. Yes, sir.
3 Q. In September of 2006, were you posted to the tactical
4 firearms unit within GMP?
5 A. 2006, yes.
6 Q. In 2010, did you undertake an operational firearms
7 commander, OFC, course?
8 A. I did.
9 Q. Was that a one-week course?
10 A. If memory serves me right, I think it was.
11 Q. Were you deemed operationally competent to act as an
12 operational firearms commander at the end of that
13 course?
14 A. Yes, sir.
15 Q. You're here, constable, to tell us about your role as
16 a tactical adviser, but given that you were qualified as
17 an operational firearms commander in 2010, I'm going to
18 pause for a moment and deal with that.
19 In your second witness statement, at paragraph 8,
20 which you can turn up if you wish, but I'll tell you
21 what I'm going to ask you about, you describe what an
22 OFC is. What you say is this:
23 "An OFC is a member of the on-duty tactical firearms
24 team and they perform the role as and when required.
25 Their role is to lead the firearms team, that is

2

1 carrying out the tactical option being deployed and
2 which has been authorised. They are responsible for
3 putting in place a plan to achieve the strategic
4 tactical objectives by using the authorised tactic."
5 In a nutshell, is that the description of what an
6 OFC is?
7 A. Yes. With briefing the team as well on the ground: you
8 brief your officers prior to deployment, give everybody
9 the roles that you require of them, depending on what
10 tactic you're carrying out, and all the items you
11 mentioned, sir, yes.
12 SIR JOHN SAUNDERS: Do you have to be an AFO for a number of
13 years or for a period of time before you can qualify as
14 an OFC?
15 A. It's likely that you'd need to -- it's not... It's not
16 generally the given that new AFOs become OFCs. You need
17 to have experience behind you, sir, first -- operational
18 experience, sorry.
19 SIR JOHN SAUNDERS: And in general terms, the percentage of
20 AFOs who are also OFC? Could you give me a rough idea?
21 A. How many officers you would be commanding?
22 SIR JOHN SAUNDERS: No, sorry, how many of the AFOs are also
23 qualified as OFCs?
24 A. I couldn't give you a number, sir.
25 SIR JOHN SAUNDERS: Percentage-wise?

3

1 A. I really couldn't because of the number of AFOs that
2 we have. I'd say out of each team within the tactical
3 firearms unit, they'll average about three OFCs per
4 team.
5 SIR JOHN SAUNDERS: How many are in a team?
6 A. You can have round about -- because it's changing all
7 the time, I would say an average of 21 or 22 people on
8 a team.
9 SIR JOHN SAUNDERS: Okay. That gives me an idea, thank you
10 very much.
11 MR DE LA POER: Does the OFC, as you understand the role,
12 have obligations under JESIP?
13 A. Under JESIP? Oh...
14 Q. If that's too general a question, I can be more
15 specific.
16 A. Please, yes.
17 Q. For example, JESIP envisages a forward command post or
18 point.
19 A. Yes.
20 Q. Would an OFC be expected to locate themselves there or
21 would they be carrying out their duties elsewhere?
22 A. They'd be carrying out their duties elsewhere, sir,
23 which would be managing, organising and leading
24 a firearms teams what's been deployed.
25 Q. In 2014, did you qualify as a tactical adviser?

4

1 A. I did, yes.
 2 Q. In fact, is that often referred to as a tac adviser?
 3 A. It is, yes.
 4 Q. Did that involve you undertaking a two-week course?
 5 A. It is.
 6 Q. I'm going to ask for a document to come up on screen now
 7 which I think you have seen overnight, certainly before
 8 you've come in the witness box. It's a College of
 9 Policing document we have already looked at.
 10 {INQ004140/6}.
 11 We can see on screen there the heading "Tactical
 12 adviser". Having had a chance to read that before you
 13 came into the hearing room today, does that description
 14 there accord with your understanding of the role or is
 15 it -- was your understanding in 2017 different to that?
 16 A. No, it's pretty much the tactical adviser's role.
 17 Q. So for example, we can see at the second bullet point:
 18 "Advises the strategic or tactical firearms
 19 commander on the implication of any tactical parameters
 20 which have been set."
 21 A. Yes.
 22 Q. And at the third to last:
 23 "Should be in a position to assist and advise the
 24 tactical firearms commander at all stages of the
 25 operation."

5

1 A. Yes, sir.
 2 Q. Obviously, I have just picked out others, but that in
 3 your understanding was your role in May 2017?
 4 A. Yes, sir.
 5 SIR JOHN SAUNDERS: So why is it necessary to have this?
 6 I'm sure it is, but I just need to know. Tactical
 7 firearms commanders themselves are experienced firearms
 8 officers. They would have been trained as tactical
 9 commanders. So they ought to understand what's meant,
 10 what tactical decisions they can make, so what role are
 11 you actually carrying out?
 12 A. Sorry, sir, did you refer to the tactical firearms
 13 commander being firearms officers?
 14 SIR JOHN SAUNDERS: Okay, tactical firearms commander is
 15 experienced at commanding firearms officers?
 16 A. Yes, sir.
 17 SIR JOHN SAUNDERS: So what are you adding to the picture,
 18 just in practical terms?
 19 A. Because as the AFOs and tac advisers we do the job
 20 operationally, we carry out those tactics. And as a tac
 21 adviser, we know what the implications are surrounding
 22 certain tactics to working with the TFC's working
 23 strategies and threat assessments or any parameters he
 24 might set. He may give a parameter where I'm happy with
 25 me doing that but I don't want you to do this without

6

1 going into tactics and you'll say what -- we'll give the
 2 implications of a way that might not be achievable or
 3 viable. So we give them a set structure of tactics that
 4 they can use that will work in with their strategic aims
 5 and their working strategy because we're the operators,
 6 if you like.
 7 SIR JOHN SAUNDERS: Because you've done the job on the
 8 ground?
 9 A. Yes, we're operationally competent and experienced.
 10 SIR JOHN SAUNDERS: Clearly some of the tactical firearms
 11 commanders will be people who have done the job on the
 12 ground?
 13 A. Not necessarily, sir.
 14 SIR JOHN SAUNDERS: I'm sure not necessarily, but won't some
 15 of them?
 16 A. I can't think of -- maybe only one or two TFCs who have
 17 been operational firearms officers.
 18 SIR JOHN SAUNDERS: Okay, thank you.
 19 MR DE LA POER: You bring the experience that you have as
 20 somebody who has acted on the ground, carrying
 21 a firearm, to add to the decision-making of the
 22 commander?
 23 A. Yes, sir.
 24 SIR JOHN SAUNDERS: Thank you.
 25 MR DE LA POER: I'll turn now and deal with Operation Plato.

7

1 It's important here that we focus upon your
 2 understanding of that in May of 2017.
 3 What did you understand Operation Plato to be in
 4 May 2017?
 5 A. My understanding of Operation Plato, sir, is if we get
 6 what we believe to be a terrorist-type attack, which
 7 includes explosions, bombs, and also a marauding
 8 terrorist firearms attack, there's other elements but
 9 they are the two main elements that would signify that
 10 we're under a Plato attack or an attack that warrants
 11 a Plato response.
 12 Q. If I can reflect that back to you, tell me if I've
 13 understood correctly: your understanding in May 2017 was
 14 Operation Plato related to a terrorist attack as opposed
 15 to only relating to a marauding terrorist firearms
 16 attack?
 17 A. There was two elements with the Plato: there was the
 18 explosion side and also the reports of a marauding
 19 terrorist firearms attacks. So we had the two elements
 20 which linked into a Plato-type incident or response.
 21 SIR JOHN SAUNDERS: Do you mean you needed both?
 22 A. Well, there's certain things where you could have -- you
 23 could have a terrorist incident -- in my understanding,
 24 you could have a terrorist incident where it may not
 25 warrant a Plato response from, obviously, the other

8

1 agencies, it may be something that could be dealt with
 2 locally. But when you have more than the one element,
 3 as we believed that we had at the time in 2017, it
 4 warranted the response of the Plato because of the -- we
 5 knew the explosion was fact but we had the information
 6 of the marauding terrorist firearms attack, which was
 7 linked to it.
 8 MR DE LA POER: So if it had been the case that a conclusion
 9 was reached that it was just an explosion,
 10 a terrorist --caused explosion, would that have warranted
 11 a declaration of Operation Plato in your understanding
 12 in May 2017?
 13 A. If we could say for fact at that time that is the only
 14 incident, that's the only thing that's happened and it's
 15 the only thing that's going to happen, then it wouldn't
 16 be warranted to be a Plato in my understanding, sir.
 17 SIR JOHN SAUNDERS: Okay. It may be an important
 18 difference. So if you have an explosion then
 19 Operation Plato is justified until you are satisfied
 20 that there is no marauding gunman or is it you declare
 21 Plato once you've got some idea that there is
 22 a marauding gunman, some support for that idea? Do you
 23 understand where the difference can apply?
 24 A. The way I'll try and explain it to you, sir, is if, as I
 25 said, we think it's fact and there's not going to be

1 anything else at all, it's going to be that one
 2 incident, isn't it, to try and explain it in a better
 3 way, so it doesn't need that response. It's going to be
 4 responding to a major incident, isn't it, where we can
 5 say: that's happened and that's the only thing that's
 6 going to happen.
 7 SIR JOHN SAUNDERS: So you need to be satisfied, it's an
 8 explosion, that's the end of it?
 9 A. Yes. But it was based on the information, sir, that we
 10 had on the night --
 11 SIR JOHN SAUNDERS: Sorry, we're trying to deal with the
 12 general principle at the moment. We'll come to the
 13 night in a moment. As far as you are concerned, there's
 14 a terrorist incident, an explosion, if you're satisfied,
 15 and when you're satisfied that that's it, there's no
 16 follow-up by way of a gunman or anything else, you don't
 17 then need to declare Plato?
 18 A. No.
 19 SIR JOHN SAUNDERS: Thank you.
 20 A. Anything -- if it has been called inadvertently, you can
 21 rescind it.
 22 SIR JOHN SAUNDERS: Yes.
 23 MR DE LA POER: In your understanding of Operation Plato, in
 24 May 2017, once it has been declared, is it mandatory to
 25 impose zones or were they optional in your

1 understanding?
 2 A. It's not optional, sir. It all falls within the
 3 response, the response tactic, if you like, to how
 4 everything fits into place.
 5 Q. So mandatory following the declaration of
 6 Operation Plato to impose zones?
 7 A. Yes.
 8 Q. Was it important or not that those zones are clearly
 9 defined?
 10 A. Yes, sir.
 11 Q. Was it important or not that those zones were understood
 12 by everybody on the ground?
 13 A. Yes, sir.
 14 Q. In the scenario or in your understanding of
 15 Operation Plato, that you have an explosion, you don't
 16 yet know -- you can't say at the first moment -- and I'm
 17 not talking about May 2017, I'm talking generally --
 18 whether there is or isn't a gunman, you certainly can't
 19 reach the firm conclusion that there is no gunman?
 20 A. Certainly not, sir.
 21 Q. In that scenario, given that zoning is mandatory, how
 22 does a commander go about zoning that incident?
 23 A. Well, you'd have your commander, your ground--assigned
 24 tactical firearms commander, you'd have your forward
 25 command post, which is set up with obviously the JESIP

1 principles, with your fire and ambulance commanders.
 2 You'd need to know your zones because obviously there's
 3 stages for everything that goes along. So obviously
 4 we've got the red zone -- the hot zone I should say,
 5 sorry -- where the terrorist activity is taking place,
 6 obviously we know there's going to be armed resources in
 7 there to confront and neutralise that threat.
 8 Warm zone. It can be declared as obviously an area
 9 where a terrorist may have been or may have passed
 10 through, likely to come back to again, but we feel it's
 11 safe to send, at that time, the emergency services in
 12 into render life-saving treatment.
 13 But you've got your cold zone, you see, where you've
 14 got no trace of terrorist activity, if you like.
 15 So that forward command post is important for zoning
 16 because your forward command post needs to be set up in
 17 your cold zone, but close enough to the warm zone so
 18 that you can rapidly deploy other services to get in
 19 there and do their job, ie fire and ambulance, when
 20 they've been briefed by their commanders. So you don't
 21 want it too far away, you need that rapid deployment and
 22 in that cold-- in the warm zone.
 23 The zoning is important because they continually
 24 have to be under -- assessed and planned for because
 25 a zone can change at any incident. For example, a hot

1 zone could suddenly become a cold zone, a cold zone
 2 could become a hot zone. So you've got to bear all the
 3 information and intelligence that's coming in from your
 4 ground team, if you like, your AFOs, of how this
 5 marauding terrorist is moving around and it could change
 6 the zones.
 7 SIR JOHN SAUNDERS: That's the theory. How easy is it in
 8 practice?
 9 A. Same with everything, sir, we train for it and we train
 10 for it and we practice for it, but when it comes to
 11 reality and the human factor, there's always going to be
 12 things that are not the same as in training.
 13 MR DE LA POER: Can I just develop some of the points you
 14 made? You have mentioned the forward command post and
 15 related that to the zoning. Does zoning need to await
 16 the forward command post being established or can zoning
 17 occur before the forward command post is established?
 18 A. I would say before, sir, because on a fast moving
 19 incident like that, for instance if the AFOs are
 20 operating under emergency searches, as they were on the
 21 night, given any scenario, if they operate an emergency
 22 search and the tactical firearms commander is making his
 23 way to the seen as an OFC, it would be my responsibility
 24 because I've got casualties that need treating, I would
 25 be updating on the radio to the command, whether they're

13

1 at a forward command post or not, "I've got
 2 such—and—such an area, I can happily say this is —
 3 I believe it's a warm zone or a cold zone". So I'd be
 4 giving that information as an OFC.
 5 Q. Just one more matter of detail from what you've
 6 described, going back to my earlier question. In the
 7 explosion scenario in which no gunman has yet been
 8 identified but cannot be excluded, is there a hot zone?
 9 A. You go into an area where — the clear definition for
 10 a hot zone is where that activity is taking place for
 11 the terrorist. So based on my own working knowledge and
 12 my experience, if I entered a place like that, if
 13 I don't know where they are, I'd be calling it a minimum
 14 of a warm zone because I don't know where they're going
 15 to be, are they going to pop out in front of me, are
 16 they going to come out of a doorway. So going into
 17 a building or a structure, not knowing where they are
 18 but knowing they're in there somewhere or believing they
 19 are in there somewhere, I'd be definitely limited on
 20 a warm zone until I know their location.
 21 SIR JOHN SAUNDERS: So until you see the gunman, it's always
 22 just going to be a warm zone —
 23 A. Well, if you look —
 24 SIR JOHN SAUNDERS: — or you hear the gun going off?
 25 A. In the face of it, sir, yes, because depending on the

14

1 size of the structure or the area we're looking for
 2 somebody, we need to have an idea where they are prior
 3 to declaring it a hot zone because it could go on for —
 4 if it's outside on the streets, it could go on for miles
 5 and miles. So we do have to have a good idea where they
 6 were and have a location for them to say, "This is where
 7 the immediate threat is now", to declare it the hot
 8 zone. But other than that, not knowing where — they
 9 could be anywhere, at the very minimum, this is my
 10 personal opinion, I would be declaring — saying it's
 11 a warm zone.
 12 SIR JOHN SAUNDERS: I'm just going to relate it to the
 13 night, if you don't mind.
 14 MR DE LA POER: Of course, sir.
 15 SIR JOHN SAUNDERS: Interrupting the structure of
 16 questioning is always interesting.
 17 So on this particular night, you know that there has
 18 been a terrorist in the City Room because that's where
 19 the explosion has taken place?
 20 A. Yes, sir.
 21 SIR JOHN SAUNDERS: But when you, as the OFC, go into the
 22 City Room, you have no idea whether there's a gunman in
 23 there or not?
 24 A. In the City Room, sir?
 25 SIR JOHN SAUNDERS: Yes.

15

1 A. Yes, that's correct.
 2 SIR JOHN SAUNDERS: What you do know however, very shortly,
 3 is there are injured people, dying people in there who
 4 are being helped by people.
 5 A. Yes.
 6 SIR JOHN SAUNDERS: Is that a warm zone or a hot zone?
 7 A. On immediately entering the building, not knowing what
 8 was in there myself, because I didn't know the scene, on
 9 my obviously being faced with what they was faced with,
 10 we know people could secrete themselves, I would clear
 11 that area, sweep that area, ready to move on and then
 12 I would declare that a warm zone if I was happy there
 13 was no terrorist activity in that area.
 14 SIR JOHN SAUNDERS: So it's a hot zone to start with, is it?
 15 A. Yes, because we know that's been the area of attack but
 16 we don't know until we have looked at it if there is
 17 somebody in there or not.
 18 SIR JOHN SAUNDERS: So it's a hot zone, you clear everyone
 19 out?
 20 A. Clear the area of any terrorist threat — obviously, we
 21 can't clear out casualties, but we'll clear the area of
 22 people we can do, clear the area, and then declare it as
 23 a warm zone.
 24 SIR JOHN SAUNDERS: Once you have gone round it and made
 25 sure there is no gunman —

16

1 A. There's nobody hiding away in there, yes, sir.
 2 SIR JOHN SAUNDERS: Thank you.
 3 MR DE LA POER: You have mentioned already the tactic of
 4 emergency search, which we know is the tactic that you
 5 advised in relation to on the night. It's important
 6 that we don't disclose the fine detail of that tactic.
 7 A. Yes.
 8 Q. It is described variously, though, as a high-level
 9 tactic.
 10 A. Yes, sir.
 11 Q. Do you agree with that as a description of it?
 12 A. Yes.
 13 Q. And a tactic that it is appropriate to use where it is
 14 immediately necessary to save life?
 15 A. Yes, sir.
 16 Q. Within an Operation Plato scenario, that is the plan,
 17 Operation Plato, is that the tactic that firearms
 18 officers will use?
 19 A. Dependent on the circumstances of whether it is a Plato
 20 attack, sir.
 21 Q. So in the event that they are looking for the potential
 22 marauding firearm-bearing terrorist, would they be using
 23 in effect an emergency search tactic to find and
 24 neutralise the threat?
 25 A. In a structure, in a building, yes.

17

1 Q. Because there's been some discussion about that with
 2 witnesses but that's your view, is it, it's a tactic --
 3 A. If it was in a building, a structure, that is how they
 4 would enter and search that building on an emergency
 5 search tactic.
 6 Q. Again, I will just remind you of what you said in your
 7 witness statement, but I think that it can be summarised
 8 in this way, that so far as you are concerned, whether
 9 or not Operation Plato was declared that night, that was
 10 the appropriate tactic for the firearms officers?
 11 A. Yes, sir.
 12 Q. What Operation Plato adds, is this correct, is the
 13 concept of zoning?
 14 A. Yes. You could say Operation Plato is the response to
 15 an incident, emergency search is a tactic. They're two
 16 separate entities.
 17 Q. One short further point about Operation Plato. You have
 18 told us that zoning is mandatory.
 19 A. Mm-hm.
 20 Q. You've also told us that it's necessary to review that
 21 zoning?
 22 A. Yes.
 23 Q. Because things can change very quickly?
 24 A. Yes.
 25 Q. And do you agree that the consequences of declaring

18

1 something a hot zone or a warm zone can have real world
 2 impact upon how quickly people get treatment and,
 3 in extremis, whether they live or die?
 4 A. Yes, sir, hence why the zoning is important.
 5 Q. And why it's so important to review it?
 6 A. Yes, sir.
 7 Q. Do you agree?
 8 A. Yes.
 9 Q. As a tac adviser, was it your responsibility to have any
 10 involvement in the review of zoning?
 11 A. No, sir.
 12 Q. Not?
 13 A. No.
 14 Q. Was it your responsibility to remind the tactical
 15 firearms commander that they should be reviewing their
 16 zoning?
 17 A. No, sir.
 18 Q. Does anybody have the obligation to remind the tactical
 19 firearms commander to do that or is that, as you
 20 understand it, purely the responsibility of the tactical
 21 firearms commander?
 22 A. It can be difficult to say that it's the responsibility
 23 solely of the tactical firearms commander because given
 24 the arena, for instance, he's going to be outside the
 25 arena, he doesn't know what's going on in there. So

19

1 you'd need to have that link between your OFC because
 2 I don't think it's feasible to expect somebody sat maybe
 3 3 or 4 miles away to say, "I'm declaring that a warm
 4 zone or a hot zone", when they don't know what's going
 5 on in there. So you need that link between your OFC to
 6 feed back information all the time.
 7 Q. Tell me whether this is right or wrong, appreciating
 8 I have no experience of these situations: are you
 9 envisaging a scenario in which the tactical firearms
 10 commander will say to the operational firearms
 11 commander, "Tell me what it's like on the ground and
 12 we will zone it"?
 13 A. They'll be asking for updates all the time so they can
 14 make the decision from the updates they are given
 15 because the OFC might turn round and not even say it was
 16 a zone, "I'm happy with this area, that it's clear", or,
 17 "I'm not happy with this area", so you can make them
 18 decisions on zoning. But most experienced firearms
 19 officers they know their zoning and what the
 20 implications are of the zoning and OFCs will probably
 21 pass back to the TFC, "I'm happy with this area and we
 22 can declare it cold". But it is up to the TFC to
 23 declare it.
 24 SIR JOHN SAUNDERS: Well, why? The OFC is on the ground, he
 25 actually sees what's there, he's an experienced firearms

20

1 officer , he knows his zoning, as you've just said .
 2 You have got to pass back to the TFC a description of
 3 where you are --
 4 A. Yes.
 5 SIR JOHN SAUNDERS: -- what bit we're talking about, what
 6 the parameters are of it , where actually what is needed
 7 is the guy on the ground saying to the people around
 8 him, "This is a hot zone and that's a warm zone". So
 9 why involve the tactical firearms commander at all?
 10 A. Because that's when other things start coming into play
 11 then, sir , especially with the ground--assigned tactical
 12 firearms commander, who's at the forward command post.
 13 Then if you declare somewhere a warm zone, then the
 14 emergency response from the fire and the ambulance,
 15 they've got to --
 16 SIR JOHN SAUNDERS: I understand when we get to having
 17 someone at the forward command post. As you know, on
 18 this night we never had a forward command post, so you
 19 never get there.
 20 But the initial declaration of zoning will be done
 21 probably, or at least possibly, at a time before there
 22 is anyone at the forward command post.
 23 A. I completely agree, sir .
 24 SIR JOHN SAUNDERS: So why is that not done by the OFC who's
 25 on the spot, sees what it is , and can simply say look,

21

1 within this parameter, whereas he has to describe
 2 sometimes over the radio to someone who probably has
 3 never been there in his life , has not got a plan of what
 4 he's talking about, describe to him so he can define it
 5 what the area is we are talking about.
 6 A. The only answer I can give to that is I agree with you,
 7 but within the JESIP plan, those other emergency
 8 services , even though they are now being deployed into
 9 a warm zone or a cold zone, they have to be briefed by
 10 their command structure, given their limits of
 11 exploitation of where they can go, rather than, I think
 12 what you're suggesting, which is the OFC saying, "This
 13 is a warm zone, can we get people in here now?" In an
 14 ideal world, but they have to be briefed by their
 15 commanders prior to going in inside and giving the
 16 assistance that's and set limits of exploitation .
 17 SIR JOHN SAUNDERS: Okay. Thank you.
 18 MR DE LA POER: Might the OFC not tell an unarmed police
 19 commander, "This area is safe or this area is warm",
 20 which in turn could be relayed via the unarmed commander
 21 to the other emergency services on the ground?
 22 A. I'm not sure whether I know the exact answer to that,
 23 sir , because we work around tactical firearms
 24 commanders. Whether a non--tactical firearms commander
 25 can give that, I don't know, sir .

22

1 Q. I will leave that there. I'm going to turn to 22 May
 2 now. We'll briefly touch on some of the themes that
 3 we have looked at already. Were you on duty at a police
 4 location in Manchester on the evening of 22 May?
 5 A. I was, sir .
 6 Q. Were you on duty in the role of tac adviser?
 7 A. I was, yes.
 8 Q. Did you have access to a radio?
 9 A. Yes.
 10 Q. I make clear we're not using any channel numbers at all,
 11 but we're going to refer to one of the channels that you
 12 had access to as the national firearms channel.
 13 A. Yes.
 14 Q. Were you monitoring that?
 15 A. Yes, sir .
 16 Q. Did you have other duties to occupy you or was your sole
 17 focus listening to the radio?
 18 A. No, sir , at the time I was in the -- working towards
 19 promotion, so I was a temporary sergeant at the time, so
 20 I was a sergeant of the firearms team that was on duty
 21 that night, so I had other responsibilities as well,
 22 obviously managing my team.
 23 Q. Might those responsibilities take you away from the
 24 radio?
 25 A. It's a handheld radio, so if I move around the building

23

1 I always have my radio with me.
 2 Q. I understand. So do you have, please, access to what
 3 I'm describing as the audio schedule? Thank you very
 4 much indeed.
 5 We must bear in mind, constable, that others don't
 6 have access to this , so together I hope we can summarise
 7 the content and if I mis--summarise it, you tell me, but
 8 hopefully you will be able to agree.
 9 A. Yes, sir .
 10 Q. The first entry is timed at 22.36.16. We've heard part
 11 of this already, but can you confirm that the
 12 conversation begins with Mr Sexton saying, "Force duty
 13 officer ", and you identifying yourself?
 14 A. Yes, sir .
 15 Q. Inspector Sexton saying:
 16 "It's looking legit this one."
 17 To which you reply:
 18 "What is, explosion or gunshots?"
 19 And he said:
 20 "An explosion reported and reports of gunshots."
 21 A. Yes.
 22 Q. Having spoken between yourselves a little further , does
 23 Mr Sexton say:
 24 "Yeah, straight to scene."
 25 A. Yes.

24

1 Q. And you say:
 2 "Emergency search?"
 3 A. Yes, sir.
 4 Q. And I think, as it's transcribed there, you pose it as
 5 a question?
 6 A. No. Well, yes and no: it's the tactic I'm offering
 7 at the time.
 8 Q. You're offering that?
 9 A. Yes.
 10 Q. And it's for him to accept or reject --
 11 A. Yes.
 12 Q. -- as the commander and he says, "Yes".
 13 A. Yes.
 14 Q. So that is the high-level search for and neutralise the
 15 threat tactic?
 16 A. Yes, sir.
 17 Q. Having had that conversation, what did you then do?
 18 A. We were listening for updates then on the radio for any
 19 change of information should I need to give any further
 20 tac advice. So the FDO's deploying the ARV to go
 21 straight to the scene so then it's an update, waiting
 22 for what's going on down there should we need to give
 23 any more tactical advice, should we need to change
 24 anything, or at the moment it was a case of waiting
 25 until they got there and finding out what was going on

25

1 before we took it any further.
 2 Q. The next entry is the third one down that I'm going to
 3 take you to --
 4 SIR JOHN SAUNDERS: Sorry. You have heard an explosion,
 5 reports of gunshots, it must bring up in your mind
 6 terrorist attack?
 7 A. Yes, sir.
 8 SIR JOHN SAUNDERS: Did you think of saying, "Should we
 9 declare Plato"?
 10 A. At that time, I'm not sure whether I'd already heard the
 11 call of Plato, looking back at it, because I know one of
 12 the officers, I think it was Lee Moore, shouted up
 13 a Plato incident over his radio. So I'm not sure
 14 whether I'd heard it at that time or not. But based on
 15 the information that we had, to go down there -- and
 16 I think even to call Plato then, as we know within the
 17 police, we get a lot of hoax calls anyway, some calls
 18 are misleading but with good intent. So it was always
 19 a way to get down there and have a look at what's going
 20 on first to just make sure everything's coinciding with
 21 the information that we're receiving.
 22 MR DE LA POER: If it helps you, Mr Moore's broadcast is at
 23 22.43, so it is after this.
 24 A. Yes.
 25 Q. We'll come back to that broadcast in due course.

26

1 So we can see you've advised an emergency search.
 2 You tell us you are now monitoring the radio. The next
 3 transmission I would like to draw your attention to,
 4 which has been identified as having your involvement, is
 5 at 22.52.04, where you are recorded in the first line as
 6 saying:
 7 "Chief Inspector Buckle is making her way in."
 8 If we have a look at the next entry, which is a few
 9 seconds later, do we see --
 10 SIR JOHN SAUNDERS: I'm really sorry, I think this relates
 11 to the one before as well, doesn't it? Don't they
 12 follow on from each other?
 13 MR DE LA POER: Yes, I was going to do it in a slightly
 14 different way. They certainly do. Because we can see
 15 the next one, Mr Lawton, you say:
 16 "Boss, it's Paul Lawton, I've contacted
 17 Chief Inspector Buckle, who's making her way in."
 18 To which Chief Inspector Dexter says:
 19 "Roger. Can you get her to go on to the force
 20 control room, please, initially and I'll take
 21 ground assigned initially, but I'm on my way from
 22 [REDACTED]
 23 A. Yes.
 24 Q. As the chairman has quite rightly said, the sequence is
 25 you hear Mr Dexter on the radio asking about

27

1 ground-assigned. You reply, "Chief Inspector Buckle is
 2 on her way in". You then speak directly to Mr Dexter
 3 and the result is that he would like her to go to the
 4 force control room and he's going to travel from
 5 [REDACTED] to undertake the ground-assigned?
 6 A. That sounds about right, but I -- where's that on the...
 7 SIR JOHN SAUNDERS: It's the one you've just been looking at
 8 and the two before. They all just sort of follow on
 9 from one another, but that's what the general effect is.
 10 A. Yes.
 11 MR DE LA POER: This is at 22.52 or thereabouts that you're
 12 broadcasting. There's no mention between you and
 13 Mr Dexter, in what is a very, very short conversation,
 14 about Operation Plato?
 15 A. No.
 16 Q. At this stage were you unaware that Operation Plato had
 17 been called?
 18 A. At 22.52, I believe, going on to later transmissions and
 19 parts that have been played to me, I believe now that
 20 I wasn't aware at that time.
 21 Q. I think we're going to come to an entry at 23.10, which
 22 we will look at, but just so everybody has in mind what
 23 you do and don't know, at this point, which is 5 minutes
 24 after the declaration of Operation Plato, you don't know
 25 that it has been declared?

28

1 A. No, sir.
 2 Q. At this point, had you had any discussion with
 3 Inspector Sexton about the potential declaration of
 4 Operation Plato?
 5 A. Yes, sir, I had.
 6 Q. When did you have that?
 7 A. I think it was the initial contact, when obviously --
 8 like Sir John said, when we got that information, was
 9 Plato going through my mind, yes it was, because it was
 10 going through my mind that it was a terrorist attack,
 11 and I believe it was either a phone call or a radio
 12 message, I'm not too sure, but I believe -- it's still
 13 in my mind, even though it's not been captured anywhere
 14 on recordings that I had that conversation with
 15 Mr Sexton surrounding if this is a Plato incident.
 16 Q. You're right to say that although a great deal of work
 17 has been done on this, certainly it hasn't been drawn to
 18 the inquiry's attention, that conversation, and it may
 19 be that it wasn't captured, but I would like to just
 20 know from you what your recollection is of that
 21 conversation.
 22 A. Obviously, my recollection is on the phone, when we get
 23 an incident like this, if it was coming through to me
 24 now, I'd be saying, "Are we looking like this is
 25 a Plato, boss?", based on the information or words to

29

1 them effect and it highlighted my belief in that
 2 conversation a little bit more --
 3 MR COOPER: I wonder if the witness could slow down
 4 a little, please.
 5 SIR JOHN SAUNDERS: I was thinking that. It's always very
 6 difficult to ask a witness not to speak in the way they
 7 do naturally, but various people are making notes of
 8 this and it would just be a help if you were able to
 9 slow down just a bit.
 10 A. Okay, sir -- sorry, I've lost my train of thought now.
 11 SIR JOHN SAUNDERS: I'm not surprised.
 12 MR DE LA POER: We were at the point where you were telling
 13 us about the conversation that you'd had with Mr Sexton
 14 in which you said, and I think I've remembered this
 15 correctly, "Are we looking at Plato?", or something like
 16 that.
 17 A. Yes, sir, and I believe -- even though it is not
 18 recorded, I believe listening to Mr Sexton's evidence,
 19 I think there was comment mentioned at some point in his
 20 evidence that the declaration of Plato went on the
 21 incident log or FWIN prior to him actually declaring it
 22 and I think he made reference to it may have been
 23 somebody who's overheard him having a conversation
 24 regarding Plato with somebody but he weren't sure who it
 25 was and I seem to think that conversation might have

30

1 been the one he was having with me.
 2 Q. I'm not sure that's right that it went on the FWIN,
 3 I think it was mentioned by somebody else in a radio
 4 transmission earlier than the 22.47. But it's your
 5 belief, having heard Chief Inspector Sexton's evidence,
 6 that the conversation you have a recollection with,
 7 which involved mentioning Plato, may have prompted --
 8 A. That call, yes, sir.
 9 SIR JOHN SAUNDERS: I think, just so there's no confusion,
 10 my recollection of the evidence is he did declare it at
 11 22.47 at the time it went on the FWIN.
 12 MR DE LA POER: Quite so.
 13 SIR JOHN SAUNDERS: So it may have been mentioned
 14 beforehand, and indeed it was --
 15 A. That's what I'm referring to, sir.
 16 SIR JOHN SAUNDERS: And Mr Moore mentioned it, apart from
 17 anyone else, and at about 22.47 his declaration goes on
 18 the FWIN.
 19 MR DE LA POER: Did you offer any advice to Inspector Sexton
 20 about whether he should or should not declare
 21 Operation Plato?
 22 A. Not advice on it, sir. We had a discussion: is it
 23 looking like a Plato, this, are you thinking of calling,
 24 declaring Plato? Because it's the FDO's decision to
 25 call that Plato -- and at the time we were just

31

1 deploying to that incident, we didn't actually know what
 2 was going on there until the ARVs arrived there.
 3 Q. I appreciate that it is Inspector Sexton's decision, but
 4 isn't it your role to offer advice?
 5 A. Tactical advice, yes.
 6 Q. And does tactical advice include: I think you should
 7 declare Operation Plato?
 8 A. No, sir, it's firearms tactics I advise on.
 9 Q. So you wouldn't offer advice on whether or not in your
 10 opinion the criteria for a declaration had been met?
 11 A. I could give my opinion, sir, yes, whether I believe
 12 it's a -- the criteria's met for Operation Plato, but my
 13 role as a tactics adviser is to require -- is to advise
 14 on tactics, whereas the Plato is a response to an
 15 incident.
 16 Q. Did Mr Sexton ask for your advice or opinion about
 17 whether or not he should declare Operation Plato?
 18 A. No, sir, no.
 19 Q. As a tac adviser would you expect an incident commander
 20 who is contemplating declaring Plato to ask you for an
 21 opinion about it before they did so?
 22 A. It wouldn't be something he'd have to do or she'd have
 23 to do, but I don't see it going any way wrong if
 24 a discussion is had, but I don't think it's something
 25 they have to do because it is based on their

32

1 decision-making and their training what determines
 2 whether they declare an Operation Plato or not.
 3 SIR JOHN SAUNDERS: And we must remember that certainly
 4 you've never been involved in an actual declaration of
 5 Plato before, and there had only been one other before
 6 this.
 7 A. That's correct, sir, yes.
 8 MR DE LA POER: Moving through the chronology, I hope
 9 relatively quickly, but not too quickly, can you see the
 10 entry which is three from the bottom, timed at 22.54.27?
 11 A. Yes, sir.
 12 Q. In which, in the third line, you inform Inspector Sexton
 13 that you have, as you put it, called in two more teams?
 14 A. Yes, sir.
 15 Q. So behind the scenes, so to speak, you are managing the
 16 deployment of additional firearms resources?
 17 A. Yes, sir.
 18 Q. Was that as tac adviser or was that as sergeant?
 19 A. That's as sergeant and it's doing what needs to be done.
 20 Q. 22.58, the final entry on the page, four lines down,
 21 do you say to Mr Sexton:
 22 "Boss can we start bringing Merseyside and Cheshire
 23 ARVs over to assist?"
 24 A. Yes, if it's there, I will have said that.
 25 Q. Again, was that you offering advice as a tac adviser to

33

1 Mr Sexton or as the sergeant in charge of the firearms
 2 department?
 3 A. That's me as sergeant requesting additional resources,
 4 sir.
 5 Q. Then we're going to come to 23.05.56, which is over the
 6 page, the fourth entry down. There are others,
 7 everybody should understand, but I just want to pick out
 8 some. If others consider them to be relevant they will
 9 take you to them. Do you see, and we must be careful in
 10 our language here, constable, that there is a discussion
 11 between you and Inspector Sexton about military assets?
 12 A. Yes, sir.
 13 Q. Again was that as tac adviser or as sergeant?
 14 A. That is as a sergeant, of things that had started to be
 15 put into place.
 16 Q. Then we come to the conversation that you have referred
 17 to at 23.10.54 at the bottom of the page. What we're
 18 going to do here, because it's only about 30 seconds
 19 long, is just play that conversation so that everybody
 20 can hear it. Mr Lopez is going to help us with the
 21 transcript as well.
 22 INQ018834A, starting at 7:26, concluding at 7:57,
 23 and concurrently on the screen, please, {INQ018834T/4}.
 24 (Audio recording played to the inquiry)
 25 Thank you. As is quite apparent from that

34

1 conversation from the question you ask, he's not
 2 declaring Plato though yet, is he? At that point you
 3 didn't know that Operation Plato had been declared?
 4 A. No, that's the point I became aware of it.
 5 Q. The way you have framed that, and I appreciate this is
 6 a fast-moving situation so I don't want to become too
 7 hung up on the language:
 8 "But he's not declared it Plato though yet, is he?"
 9 That might suggest that you don't think that Plato
 10 needs to have been called by this point.
 11 A. No, sir. No, that's... I was just -- "Has he called it
 12 yet?", in that sense, but not that I didn't think it
 13 should be.
 14 Q. I understand.
 15 You have already mentioned Lee Moore saying over the
 16 radio before the declaration, "Yes, Operation Plato,
 17 Operation Plato". You were monitoring the radio
 18 channels?
 19 A. Yes, sir.
 20 Q. On the information that I have, Mr Sexton's declaration
 21 of Operation Plato was broadcast on the national
 22 firearms channel. I'm going to play that to you now.
 23 It's very short and it arises in context of
 24 a conversation with an officer called
 25 Christopher Charlton, who I think is a firearms officer ;

35

1 is that right?
 2 A. He was, yes.
 3 Q. {INQ018839A/1} at 17:39 to 17:54. We're not going to
 4 put a transcript up, it's just very short.
 5 (Audio recording played to the inquiry).
 6 You heard it there, he mentions Op Plato twice.
 7 A. Yes, sir.
 8 Q. As I understand it, that is over the national firearms
 9 channel?
 10 A. Yes, sir.
 11 Q. And as I understand your evidence to this point, that
 12 was a channel that you were monitoring?
 13 A. Yes.
 14 Q. That is timed at 22.47. Can you just help us with how,
 15 bearing in mind you didn't know about it until 23.10,
 16 you missed that?
 17 A. Yes, sir. Obviously, that's a couple of seconds long,
 18 that transmission. As you've reiterated too with
 19 getting resources, I'm doing other things in the
 20 background, I've got other people talking to me, working
 21 in my office, and I think the shortness of that
 22 transmission is something I've quite simply missed with
 23 all the communications that are coming through on the
 24 other channels, so it's evident it's something I've
 25 missed, sir.

36

1 Q. At 22.54, also on the national firearms channel, in
 2 a very short exchange with the operational firearms
 3 commander, Inspector Sexton says this:
 4 "I obviously declared Operation Plato on it."
 5 So there is a second mention by him, this time at
 6 22.54, as I understand the spreadsheet that we've been
 7 provided by Greater Manchester Police.
 8 A. Yes.
 9 Q. Again, it would appear that you didn't hear that
 10 exchange either?
 11 A. Yes, sir.
 12 Q. I'm not for a moment doubting that you were undertaking
 13 important work, but you were the tac adviser that night.
 14 A. Yes, sir.
 15 Q. Do you think it is satisfactory that the tac adviser
 16 didn't know about the Operation Plato declaration until
 17 nearly 25 minutes after it was declared?
 18 A. At that stage, sir, I think right from the start, I was
 19 basing my planning around it being declared an
 20 Operation Plato, obviously because we had the discussion
 21 straightaway, as I reiterated to you, on the phone.
 22 Regarding the tactics, me missing that or not, it
 23 wouldn't have changed the tactical advice that was given
 24 for the AFOs to attend the arena and carry out the
 25 tactic that they did, because even if it hadn't been

1 declared a Plato, it would have still been -- is or not,
 2 it would still have been the same tactical option. You
 3 sort of like train your ear, if you like, on your
 4 radios, as an operator, for your name or your call sign.
 5 So I know if somebody had wanted me for a specific
 6 reason, for advice or anything like that, I would have
 7 picked it up.
 8 SIR JOHN SAUNDERS: Forget whether it made any difference on
 9 this particular night. The reality is that you had two
 10 jobs to do. You called in the resources?
 11 A. Yes, sir.
 12 SIR JOHN SAUNDERS: That involved you ringing/radioing round
 13 your own resources and also other forces' resources, all
 14 of which must take a bit to do to explain what's going
 15 on to an extent. If you're also being the tactical
 16 adviser, would it be better if you were simply able to
 17 concentrate on the firearms channel in case something
 18 came up which suggested to you a different tactic should
 19 be used --
 20 A. Yes, sir.
 21 SIR JOHN SAUNDERS: -- rather than you having to do both
 22 things?
 23 A. Yes, sir.
 24 SIR JOHN SAUNDERS: Thank you.
 25 MR DE LA POER: Based on your very considerable experience,

1 constable, what changes to the system that was in place
 2 in May 2017 could be made to ensure that the tactical
 3 adviser was able to respond instantly to any change in
 4 the circumstances? Is it simply to dedicate them to
 5 that, as the chair has suggested, or does there need to
 6 be a requirement for the FDO to communicate with them,
 7 to call them up to check that they've heard it?
 8 A. Even as a sergeant, I always had that direct link with
 9 the force duty officer or the TFC. Like I say, I've
 10 missed a couple of these announcements, but it wouldn't
 11 have changed -- it would have made no difference to the
 12 tactics whatsoever and I'd have known if he'd wanted me
 13 for something else, even while I am doing these other
 14 roles, I would be phoning people round and things like
 15 that. However, yes, I fully agree it would be better if
 16 the tactical adviser, that is his lone job -- when a job
 17 comes in, that is your one and only job. Unfortunately,
 18 I wasn't in that position on the night of the 22nd.
 19 Whether it has changed for the tac advisers over
 20 at the operational firearms unit at the moment, I really
 21 couldn't answer because I work in a different department
 22 now, so I don't know whether they do it standalone any
 23 more, so I couldn't really answer that.
 24 Q. Did you hear any mention of zoning over the radio that
 25 night?

1 A. No, sir.
 2 Q. Bearing in mind that your understanding was that zoning
 3 was mandatory in Operation Plato, at any point in the
 4 evening, having not heard it mentioned, did that absence
 5 strike you?
 6 A. It was something that was put in my mind at one point
 7 because of obviously knowing the response to a Plato and
 8 the JESIP principles. However, not being on the ground
 9 and deployable and not knowing what's going on in there,
 10 you are wondering, but you don't know what they're
 11 dealing with or whether they're just considering
 12 everything as a hot zone. And without being there to
 13 see it and take in situational awareness, it's down to
 14 the people on the ground to make that decision and I'm
 15 not in a position to do that.
 16 Q. If zones have been imposed, do they need to be broadcast
 17 over the national firearms channel?
 18 A. People need to know, yes.
 19 Q. Because there's been some suggestion, and I think you
 20 maybe used this phrase earlier yourself, that the
 21 firearms officers know what they're doing --
 22 A. Yes, sir.
 23 Q. -- and, as we heard from Mr Richardson yesterday,
 24 they're allowed to go everywhere, so the fact that it's
 25 a hot zone doesn't prohibit their activity. But there

1 are good reasons around safety for them to know where
 2 the hot zone is, aren't there?
 3 A. Firearms officers?
 4 Q. Yes.
 5 A. They will respond in a way that they can deal with
 6 a threat, should it appear. That will be part of their
 7 tactics, so they will be treating everything as a
 8 threat, and so they will have their own security, the
 9 way they work.
 10 Q. Knowing that a particular area, let's just say a room,
 11 is a hot zone, isn't that quite important for all of the
 12 firearms officers, whether they are in that hot zone or
 13 not, for them to know that?
 14 A. Yes, sir, yes.
 15 Q. Is it your understanding that it was beyond the scope of
 16 your role as a tac adviser to point out to the firearms
 17 commander, the tactical firearms commander, "You haven't
 18 zoned this, we need zones, sir"?
 19 A. No, sir, because I don't know what is happening on the
 20 ground. I'm not there as, let's say, as we call it,
 21 boots on the ground. I'm there, my role is to give tac
 22 advice to a situation should the TFC require tactical
 23 advice on how to deal with the situation. I can't be
 24 doing the two roles where I'm trying to assess what
 25 should be and what shouldn't be happening at the scene.

41

1 Q. I'm not going to look at any more calls, although that's
 2 with no disrespect intended to you, constable, because
 3 obviously you continued to work and there are a number
 4 of broadcasts subsequently.
 5 I just want to focus upon that first hour. You
 6 became aware within 5 minutes of the incident such that
 7 you were able to be in touch with the FDO?
 8 A. Yes.
 9 Q. You've told us that you advised on emergency search?
 10 A. Yes.
 11 Q. And we've seen that. You have a recollection of
 12 speaking to Mr Sexton in which Operation Plato was
 13 mentioned between the two of you but in which you did
 14 not offer any tactical advice.
 15 A. The tactical advice given was for the emergency search
 16 even though we had the discussion about Plato.
 17 Q. Because the tactical advice remained the same?
 18 A. Yes.
 19 Q. Were there any other occasions within that hour that you
 20 have a recollection of where you offered tactical
 21 advice?
 22 A. No, because we received no updates that had changed the
 23 tactical advice that was already given. They was still
 24 under emergency search because they was still trying to
 25 identify, locate, confront and neutralise a possible

42

1 threat, so they were still within the same tactic that
 2 had been authorised.
 3 Q. So that having been authorised at the start, by the end
 4 of this hour period, as I have chosen to focus upon,
 5 that tactic remained valid and therefore no further
 6 contribution as a tac adviser was required from you?
 7 A. That's correct, sir.
 8 Q. You made some notes of the evening. Have you had
 9 a chance to refresh your memory?
 10 A. I've looked at them because I know there are a lot of
 11 scribbles and the collar number --
 12 Q. There is no criticism from me about that whatsoever. Is
 13 it right that the phrase Operation Plato isn't mentioned
 14 anywhere within those notes?
 15 A. That's right, yes.
 16 Q. Just could you help me with why you wouldn't have noted
 17 down the fact, as you were making notes, that
 18 Operation Plato had been declared?
 19 A. The way I operate -- it was a note, I know, sort of
 20 thing, and I don't mean that with any disrespect,
 21 because I'm still carrying on my function and my
 22 function then mainly, unless I needed to give tac
 23 advice, was related around managing resources, managing
 24 staff, managing what was coming in. It was involving
 25 stopping people coming in to work because I knew from

43

1 that moment in time our whole working pattern would
 2 change within the firearms unit. So it was making sure
 3 we've got resources for the next day and the day after
 4 and to change the shift pattern from what the normal
 5 working was. So it was a case of -- my notes was collar
 6 numbers, of vehicles and where they were coming in from
 7 different areas of the region. As we know, they came in
 8 from all different areas. So my notes was for that
 9 whereas I was concentrating on my role as staffing and
 10 I did -- I was concentrating on what we call to be
 11 disposition board, which was basically the whiteboards,
 12 it was full of every AFO that we have on the unit and
 13 making a note of who's in, who's not in, who you have
 14 told not to come in, when they're coming in, and
 15 managing vehicles, because we was running out of
 16 vehicles rapidly because of the deployment that we had
 17 with the people coming in from home.
 18 MR DE LA POER: I understand. Thank you very much indeed,
 19 PC Lawton. Those are my questions.
 20 We do have Rule 10 requests. Firstly, can
 21 I enquire, please, of Mr Smith Queen's Counsel whether,
 22 on behalf of North West Fire Control, he has any
 23 questions.
 24 Questions from MR SMITH
 25 MR SMITH: Yes, please.

44

1 In your position as force firearms tac adviser, and
 2 just looking at this generally, that is without
 3 reference to the events of 22 May, if the only
 4 information you had that a bomb has exploded in a public
 5 place, resulting in multiple casualties, would you
 6 proceed on the basis that this is likely to be
 7 a terrorist incident?
 8 A. It'd be an assumption that it's a terrorist incident,
 9 yes, sir.
 10 Q. And would you also proceed on the basis that there would
 11 then be a risk that a marauding terrorist firearms
 12 attack may follow?
 13 A. Yes, sir, because that was the information that we
 14 received on 22 May.
 15 SIR JOHN SAUNDERS: Okay. You're being asked by Mr Smith
 16 specifically to talk in general terms without specific
 17 reference to 22 May.
 18 A. Sorry.
 19 SIR JOHN SAUNDERS: So just tell us in general. Is that
 20 right, Mr Smith?
 21 MR SMITH: It is, sir, yes. Thank you.
 22 SIR JOHN SAUNDERS: Could you ask your question again,
 23 please?
 24 MR SMITH: Would you also proceed on the basis that there
 25 would be a risk that a marauding terrorist firearms

1 attack may follow?
 2 A. Yes, sir.
 3 Q. Would you also proceed on the basis that a secondary
 4 attack of some sort may follow, which could take the
 5 form of an explosive device, a secondary device or some
 6 form of shooting?
 7 A. Yes, that'd be the thought process, sir, yes.
 8 Q. Would you also proceed on the basis that such
 9 a situation may become a Plato incident, depending on
 10 how it develops?
 11 A. Yes, sir.
 12 MR SMITH: Thank you very much indeed, Mr Lawton. That's
 13 all I wish to ask you.
 14 SIR JOHN SAUNDERS: Thank you, Mr Smith.
 15 MR DE LA POER: Next and penultimately, can I invite
 16 questions from Mr Weatherby, Queen's Counsel.
 17 Questions from MR WEATHERBY
 18 MR WEATHERBY: Mr Lawton, can you see and hear me?
 19 A. Yes, sir.
 20 Q. As I have understood your evidence, your role was to
 21 advise on tactical options. What I'm not so clear about
 22 is whether your role was also to prompt the commander
 23 that you were advising at a particular time about
 24 aspects of tactical advice or plans.
 25 SIR JOHN SAUNDERS: Would you like to clarify it for him?

1 A. I'm not sure what the question is, sir.
 2 SIR JOHN SAUNDERS: The question is: are you there to give
 3 tactical advice when you're asked for it or are you
 4 there to prompt the person who asked, essentially, for
 5 the tactical advice? So will you be suggesting it
 6 rather than waiting for the question? Is that right,
 7 Mr Weatherby, or not?
 8 MR WEATHERBY: Yes. You have told us quite narrowly,
 9 I think, that you were advising on emergency search.
 10 But you've also told us, and I'm going to come on to
 11 this in a little more detail, about Plato. Wasn't it
 12 your role as the firearms tactical adviser to say to
 13 Mr Sexton what elements of Plato he may have missed?
 14 A. No, sir. When it comes to giving tactical advice, I'm
 15 not prompting in any way. He'll give me the information
 16 and ask for advice and I will give him that tactical
 17 advice, if I'm understanding your question right. To
 18 make any decisions around Plato, we'll have professional
 19 discussions, as most people would, but it's down to the
 20 FDO to declare whether this is an Operation Plato
 21 incident, if that makes sense.
 22 Q. It does make sense, yes. His role and responsibility is
 23 to take the decisions?
 24 A. Yes, sir.
 25 Q. And your role and responsibility is to give advice,

1 based on your expertise and training. So you're not
 2 responsible for his decisions but you are responsible --
 3 A. (Overspeaking).
 4 Q. Sorry.
 5 SIR JOHN SAUNDERS: You answer now, please.
 6 A. It's not to prompt him, it's to give advice on the
 7 tactical decisions within -- where firearms officers
 8 would need to be deployed into an area to carry out
 9 a certain tactic (overspeaking).
 10 MR WEATHERBY: Yes. You've drawn a distinction between
 11 Plato and tactical options. But you've also told us you
 12 had an early discussion with Mr Sexton about Plato.
 13 What was the purpose of the discussion about Plato with
 14 him?
 15 A. Based on what -- the information we were receiving, like
 16 I think you mentioned earlier, or somebody did, with the
 17 fact of the explosion, are we now starting to think this
 18 may be a Plato incident developing, and that was the
 19 reason for the discussion.
 20 Q. So the reason for the discussion, and we'll come on to
 21 the discussion in a minute, but assuming that there was
 22 an early discussion, the purpose of it was Mr Sexton
 23 discussing with his adviser, his expert adviser, you,
 24 whether to declare Plato or not?
 25 A. No, sir. He was asking me for tactical advice to

1 respond to the incident.
 2 Q. Okay. Does it follow from that that you had no role
 3 insofar as you're concerned in advising about Plato at
 4 all?
 5 A. No, it's not to advise on Plato. That is the command
 6 structure that's in place with the TFCs. My role is to
 7 give tactical advice and tactics.
 8 SIR JOHN SAUNDERS: Can I try and draw the distinction which
 9 I think the witness may be drawing? You correct me if
 10 I'm wrong. If it may be a Plato situation, that means
 11 it may be a situation where there is a marauding gunman
 12 around.
 13 A. Yes.
 14 SIR JOHN SAUNDERS: That is something which you do need to
 15 know, isn't it, as a tactical adviser?
 16 A. Yes, to give a tactic to nullify that threat.
 17 SIR JOHN SAUNDERS: So you could simply have asked not, "Are
 18 we getting into a Plato situation", you could equally
 19 have asked, "Are we at risk of there being marauding
 20 gunman around"?
 21 A. Yes, sir, because we believed there was.
 22 SIR JOHN SAUNDERS: Yes, okay. I don't know whether that
 23 helps, Mr Weatherby. Maybe it just confuses.
 24 MR WEATHERBY: I'm not sure either. Thank you very much.
 25 In the event, your advice was emergency search?

1 A. Yes, sir.
 2 Q. And you have told us that that would be an appropriate
 3 tactical option on a Plato; yes?
 4 A. Yes, sir.
 5 Q. So have I understood you rightly that you're saying you
 6 had no involvement in whether or not Plato should be
 7 declared at that point?
 8 A. Could I just clarify something on that, sir? When you
 9 say that was -- the emergency search was the correct
 10 response for a Plato, that was the correct response for
 11 that type of Plato attack, for that type of incident
 12 what was going on, because it was within a building and
 13 a structure and they need to identify, locate, confront
 14 and neutralise the threat. That's not the only tactical
 15 option available to a Plato incident because Plato
 16 incidents, as we know, can take different forms, not
 17 just necessarily in a building.
 18 Q. Yes.
 19 A. So the advice at that time was based around what was
 20 needed to be done in that building.
 21 Q. Yes.
 22 A. With regards to Plato itself, we will have professional
 23 discussions, as I would with the OFC, do we think this
 24 is a Plato incident, but any command decisions on
 25 whether that is declared a Plato or not declared a Plato

1 rests solely with the TFC.
 2 Q. I understand that the decision rests, it's the purpose
 3 of the discussion with you. You explained that your
 4 input was the emergency search, which on your evidence
 5 is that, on the information available to you, that was
 6 the appropriate tactical option. But I'm just trying to
 7 understand the discussion about Plato. Because if the
 8 emergency search was the right option at the time, Plato
 9 led to other firearms input, didn't it? The declaration
 10 of Plato leads to the firearms officers undertaking that
 11 tactical option, emergency search, but then it leads on
 12 from that?
 13 A. No, sir. As I've just tried to explain, that tactic is
 14 for that type of scenario. I'll put it a different way
 15 to see if it makes it clear. Let's say, for instance,
 16 there was a concert going on, as there was, but there
 17 was no terrorist input and there were two rival gangs in
 18 there and they had firearms and started shooting at each
 19 other and members of public was getting caught in the
 20 crossfire, the ARVs would still be given that same
 21 tactic as an emergency search, whether it was under
 22 a Plato or not.
 23 The tactic is to deal with the incident of what is
 24 happening. The tactic is to deal with the firearms
 25 threat. Plato is the major incident protocol dealing

1 with other emergency services, if that makes sense. So
 2 they could have done emergency search even without it
 3 being a terrorist threat.
 4 Q. I understand that, yes. Thank you. That's helpful.
 5 The firearms officers being sent into the situation
 6 to do the emergency search would then go on to do other
 7 things, wouldn't they? So for example, they would sweep
 8 the area, they would make casualty areas safe, and as
 9 Mr de la Poer has asked you about, they would be
 10 involved in the zoning decision; yes?
 11 A. Yes, sir, so that other resources then can backfill it
 12 and start carrying out casualty --
 13 Q. So wasn't it part of your role, bearing in mind that the
 14 firearms officers that you were advising on -- was it
 15 part of your role as to whether Plato was declared so
 16 that all of those roles would flow from that decision?
 17 A. No, sir.
 18 Q. I'll move on.
 19 Mr de la Poer has taken you through your various
 20 communications during that evening. I'm going to take
 21 you briefly to one more, I think. But most of them, not
 22 at all of them, have been recorded and we've listened to
 23 some of them.
 24 The one that we've concentrated on over the early
 25 discussion about Plato, there's no recording of that at

1 all, is there?
 2 A. No, sir, there isn't.
 3 Q. And that has led to some differences between two of your
 4 statements, hasn't it? In your early statement you
 5 hadn't heard the recordings and you gave an account of
 6 this early discussion about Plato, didn't you?
 7 A. Yes, sir.
 8 Q. I'll take you to the statements in a bit. Then in your
 9 more recent statement you said there was some confusion
 10 and, perfectly understandably, some difficulties with
 11 recollection over the order of things; yes?
 12 A. Yes. When I gave the third statement, I did put in my
 13 statement, due to the lack of audio, but it did still
 14 remain a very vivid memory of mine, that conversation --
 15 sorry, that (overspeaking).
 16 Q. The part of the APP, the Authorised Professional
 17 Practice for armed policing that Mr de la Poer put up on
 18 the screen at the start of the questioning was a list of
 19 your roles. I can put it up on the screen again, but
 20 it's only a short point and I think you have it in front
 21 of you.
 22 The last bullet point on your role is, "Ensure that
 23 advice given is recorded", isn't it?
 24 A. Yes, sir.
 25 Q. Would you agree with me, if you'd had, for example,

1 body-worn audio or a dictaphone, then we would not be in
 2 this difficulty over this first important conversation
 3 about Plato?
 4 A. I fully agree, sir, yes.
 5 Q. So going forward, a lesson would be that tactical advice
 6 ought to be recorded contemporaneously?
 7 A. Yes, sir.
 8 Q. Was there a reason it wasn't on the night?
 9 A. I think it was just such a fast-flowing incident, it was
 10 a case of phone calls, and I must be honest, I believed
 11 that all our phone calls are recorded within the police
 12 service, so I thought that would be captured in the
 13 phone call.
 14 Q. Okay. Let me move to your statements then.
 15 In your first statement, I'll just put it up on the
 16 screen so we can follow this, it's {INQ029521/6},
 17 please, Mr Lopez.
 18 Paragraph 21 at the bottom. This is referring to
 19 a conversation with Inspector Sexton about
 20 Operation Plato, so this was your first recollection,
 21 and I stress it was before you were able to listen to
 22 any of the recordings; yes?
 23 A. Yes, sir.
 24 Q. It's the bottom five lines really I just want to ask you
 25 about:

1 "At one point Inspector Sexton said he was going to
 2 call Operation Plato but then it was decided, as
 3 I recall by Inspector Sexton, to put our foot on the
 4 ball and see how things developed. I'm not sure if this
 5 was before or after the confirmation of the suicide
 6 bomber."
 7 And then you go on to refer to a fast-moving
 8 situation at the Royal Oldham Hospital. Okay?
 9 A. Yes, sir, got that.
 10 Q. You have then addressed that in a later statement --
 11 SIR JOHN SAUNDERS: Before you go on, can I just clarify?
 12 It may be me mishearing. I think you described that as
 13 the first statement and it is in fact the second
 14 statement. There is an earlier statement made to
 15 Greater Manchester Police, which may not deal with this
 16 issue at all, so it may not be relevant.
 17 MR WEATHERBY: You didn't mishear, it's my fault, I did
 18 describe it as the first statement. Sorry about that.
 19 It's an earlier statement, it's dated 7 January 2020,
 20 the one we've looked at. You're referring there to this
 21 conversation, I think, and you're recalling it with some
 22 specifics. Then in your third statement, which I don't
 23 think we need to put up, you have then heard the
 24 recordings and you're not too sure about this
 25 conversation. Then today, you've given evidence that,

1 having heard Mr Sexton's evidence, you think this
 2 conversation did take place and at an early stage.
 3 Is that a fair summary so far of --
 4 A. Could I explain that, sir --
 5 Q. Yes, of course.
 6 A. -- my reasoning behind that? Yes, I did put in my third
 7 statement that because there was no recordings of it, it
 8 could be something that has been in my mind and not
 9 actually happened. But I also added in that third
 10 statement, even though there's no recordings of it,
 11 it is still a very strong memory of my night, that I had
 12 that conversation with Mr Sexton, whether it's recorded
 13 or not.
 14 Q. Yes. I'm not criticising you here. This is something
 15 there isn't a record of and you were doing your best
 16 quite some time after the incident to remember it.
 17 It is not easy, so I am not being critical about it.
 18 Your evidence now is that this conversation did take
 19 place and your recollection in this statement, you've
 20 put it in quotation marks, is that Inspector Sexton said
 21 to, "Put our foot on the ball and see how things
 22 develop"?
 23 A. Yes, sir.
 24 Q. Is that now a clear recollection of what happened during
 25 that conversation?

1 A. It is, sir, as the ARVs were deployed to the scene.
 2 Q. What did you understand that he meant by that?
 3 A. Put the foot on the ball, obviously I have the
 4 recollection now, we have sent them down there with the
 5 tactical option of emergency search and they need it
 6 when they got on the ground, when they get there. That
 7 will have then been when we were discussing is this
 8 a Plato and it was probably then Mr Sexton saying,
 9 "Let's see what's happening first, let's get our foot on
 10 the ball and see what's happening when we get there".
 11 Q. Okay. I am bearing in mind what you've said about your
 12 role on advice and with Plato. But at that point, were
 13 you thinking about the matter that you mentioned earlier
 14 this morning about Plato, that it can be stood down or
 15 rescinded if it's declared in error? Were you thinking
 16 that actually this was the time to declare Operation
 17 Plato?
 18 A. No, sir, because it was only going to be a few minutes,
 19 if that, until the ARVs got there, and I think it would
 20 be remiss to call a Plato incident when we really have
 21 no idea whatsoever what is at the scene because it may
 22 be that nothing's happened at all.
 23 Q. Yes. At this point, you've had -- on the FWIN you've
 24 had a report from the control room at the arena that
 25 a bomb has gone off and there are casualties. And then

1 you've got some less verifiable reports of gunshots.
 2 Yes?
 3 A. Yes, sir.
 4 Q. That's the context of this discussion. It's right,
 5 isn't it, that every second counts with a Plato, both in
 6 terms of the firearms response and also the emergency
 7 service response to casualties?
 8 A. That's correct, sir. But the firearms response wouldn't
 9 have been -- wasn't delayed whether Plato was called or
 10 not, because they were still going with the same
 11 tactical option to carry out when they get there whether
 12 Plato had been called or not.
 13 Q. I understand that, I'll move on from that. So the one
 14 communication I was going to raise with you that I don't
 15 think Mr de la Poer did deal with was that you had
 16 a call from Chief Inspector Buckle when she was on her
 17 way in to either the scene or HQ; is that right?
 18 A. Yes, sir.
 19 Q. That's how you were able to report that she was on the
 20 way in because you'd had a conversation with her, and
 21 again that conversation isn't recorded, is it?
 22 A. No, sir. I'd like to add to that, because it says on
 23 there, on the transcript, that I informed the FDO that
 24 she's on her way in. I can honestly say that I don't
 25 remember a conversation with Chief Inspector Buckle.

1 Q. Yes, okay. That rather reinforces the position about
 2 recording, doesn't it, and there should be a recording
 3 of the advice that you give on the night? Do you recall
 4 anything of that conversation now?
 5 A. No, sir. It's only confirmation from Chief Inspector
 6 Buckle that she actually did have a conversation with
 7 me, but I don't remember any detail of that
 8 conversation.
 9 Q. Her recollection was that there was no mention of Plato;
 10 does that surprise you?
 11 A. Yes. Not remembering the phone call, I would imagine
 12 that I would be informing her of what's happened.
 13 I would have expected it to get passed down the chain,
 14 maybe from the ITFC to the TFC, but I would would've
 15 told her what had happened certainly, but I can't
 16 remember the conversation.
 17 Q. I am bearing in mind what you've told us about your role
 18 in terms of tactical advice, but given that she was the
 19 on-call TFC, what was your role with respect to her so
 20 far as you're concerned? What was your role in terms of
 21 advising her?
 22 A. Until the on-scene TFC or the TFC who's taking over when
 23 they get to Silver or whether they get ground-assigned,
 24 I have no input with her whatsoever because the command
 25 and control is still with the ITFC, so should any

1 tactical advice be required, it will come from him
 2 because he's not done a formal handover of the situation
 3 to the on-call TFC.
 4 SIR JOHN SAUNDERS: I can understand that, but she's on her
 5 way in to take over. Wouldn't it be a good idea to have
 6 a chat about the situation and what is likely to be the
 7 effect so that you're saving time when she's actually
 8 there in Silver ready to go?
 9 A. I may have done, sir, but like I say, I can't remember
 10 the conversation that I had.
 11 SIR JOHN SAUNDERS: So you may have had?
 12 A. I may have had that conversation. I'd certainly have
 13 informed her of what happened.
 14 SIR JOHN SAUNDERS: Thank you.
 15 MR WEATHERBY: Can I put up another page from the APP,
 16 please. Mr Lopez, it's {INQ004140/7}, please, and it's
 17 right at the bottom. I'm putting this up with respect
 18 ton this call between Chief Inspector Buckle and
 19 yourself. Can we just highlight the "Transfer of
 20 command" at the bottom. This is dealing with the
 21 transfer or potential transfer of command, so:
 22 "A designated strategic firearms or tactical
 23 firearms commander may not be in a position take on the
 24 role immediately when contacted. They may, however, be
 25 in a position to ratify any strategic or tactical

1 decisions made by the officers who have assumed initial
 2 command of the incident. Initially, information can be
 3 vague and confusing. It is therefore important for
 4 effective command to be established as quickly as
 5 possible and undertaken by the most appropriate person
 6 available."

7 That's all I want to read from that and we've heard
 8 evidence about this already. But with respect to this
 9 call with Ms Buckle, you would know that she was the
 10 on-call TFC and therefore you would know that she was
 11 likely to be the person that would take over from
 12 Mr Sexton; is that right?

13 A. Yes, sir.

14 Q. We can take the document down.

15 SIR JOHN SAUNDERS: Could you just leave it, sorry? Further
 16 down, it says:

17 "On occasions, the initial tactical firearms
 18 commander may be in a better position to continue in the
 19 tactical firearms command role until a dedicated
 20 tactical firearms commander is in a position to take
 21 command."

22 Do you know what's meant by "dedicated" there? Are
 23 we talking about -- would Chief Inspector Buckle have
 24 been a dedicated firearms --

25 A. Cadre TFC, sir. That's what I was trying to explain

61

1 before. The person in command, until -- it says there,
 2 as it says, the transfer of command still lies with
 3 Mr Sexton.

4 SIR JOHN SAUNDERS: Yes, that's fine. I was just wanting to
 5 understand what was meant by "dedicated" and it's the
 6 same as cadre, so that's fine. Thank you.

7 MR WEATHERBY: That's very helpful.

8 So at the point you know that she's the on-duty
 9 cadre TFC and you know that he's quite likely to take
 10 over from Mr Sexton; we know in fact she didn't. So at
 11 that point, the purpose of the advice that she was
 12 seeking would be (a) in anticipation of taking over
 13 but (b) also that she would potentially be contacting
 14 Mr Sexton to ratify or understand the decisions that
 15 he'd already taken; is that right?

16 A. Yes, all the ratification would have to be between
 17 Chief Inspector Buckle and Mr Sexton on any decisions
 18 made prior to handover.

19 Q. What advice did you give to Ms Buckle?

20 A. In a tactical sense, none. I assume I informed her of
 21 what was happening at the scene and what had happened
 22 at the arena. There was no tactical advice to give her.

23 Q. And no discussion about Plato?

24 A. There may have been, sir, there may not. As I said,
 25 I can't remember the phone call. As far as giving her

62

1 any advice, it wasn't warranted or needed.

2 Q. But bearing in mind -- the point I'm making is that
 3 bearing in mind her role, even before taking over, was
 4 to consider and possibly ratify the decisions that had
 5 been made, she needed to be put fully in the picture and
 6 that presumably would include a discussion about Plato?

7 A. It could have been. I could have had that conversation.
 8 She may have even been informed by me that the ARVs are
 9 at the scene carrying out an emergency search. But for
 10 the ratification of what's happened, that would be
 11 between her and Mr Sexton. I can't remember, as I say,
 12 the phone call, unless Ms Buckle could tell you what we
 13 spoke about. But knowing my role, as I do, I can pretty
 14 much assume what I spoke about to her on the phone.
 15 I wouldn't have been phoning her up and saying, "Boss,
 16 can you make your way in", I'd have been telling her why
 17 and what's happened.

18 SIR JOHN SAUNDERS: Can I just see if I understand that.
 19 I just wonder in relation to an emergency search,
 20 because of the possible consequences of an emergency
 21 search, it is a high-level direction to give, as you've
 22 rightly said --

23 A. Yes.

24 SIR JOHN SAUNDERS: -- I wonder whether you would be saying
 25 to her on the way in, "I've advised emergency search,

63

1 that's what's taking place, the justification for an
 2 emergency search is A, B, C and D". Would you be doing
 3 that?

4 A. I may have done. She may have even said to me, "What
 5 are we doing with it", and I may have said, "We're
 6 carrying out an emergency search". We will have had
 7 a discussion around what's happening and what's taken
 8 place.

9 SIR JOHN SAUNDERS: Thank you, Mr Weatherby.

10 MR WEATHERBY: Finally, can I just draw a couple of things
 11 together, a couple of strands together.

12 With respect to zoning, Mr de la Poer has asked you
 13 a number of questions. Have I understood you correctly
 14 that so far as you're concerned, your role was not to
 15 advise about zoning?

16 A. It's not to advise on zoning, it's to advise on tactics.

17 Q. And not to therefore advise on reviewing zoning?

18 A. No, that will be all done from the forward command post
 19 based on the intelligence that they are receiving at the
 20 scene, how they can -- what intelligence is coming in
 21 and information, and then they can rezone their areas
 22 appropriately.

23 Q. And that was a matter between Mr Sexton and
 24 Mr Richardson initially and, so far as you're concerned,
 25 not a role for a tactical adviser?

64

1 A. That's correct, sir .
 2 Q. Therefore am I right that, so far as you're concerned,
 3 you had no role in terms of whether and when emergency
 4 service partners should be contacted?
 5 A. No, sir, that's part of the plan, and obviously in
 6 response to the Plato from the FDO.
 7 Q. Finally, this: why at 23.10 were you interested in
 8 whether Plato had been declared?
 9 A. I think I was asking for a channel for a certain reason,
 10 sir. I'm not sure I can mention it, but it links into
 11 a channel --
 12 MR WEATHERBY: I'll leave it there. Thank you very much,
 13 Mr Lawton.
 14 SIR JOHN SAUNDERS: Thank you, Mr Weatherby.
 15 MR DE LA POER: Finally, can I turn to Mr Horwell Queen's
 16 Counsel --
 17 SIR JOHN SAUNDERS: Did you ever speak to the tactical
 18 firearms commander who did take over?
 19 A. Mr Sexton -- sorry, Mr Dexter?
 20 SIR JOHN SAUNDERS: No, the one at Silver command,
 21 Mr Thompson, Superintendent Thompson.
 22 A. I think I may have done later on in the evening, sir,
 23 via the telephone. I think there's mention somewhere in
 24 the transcripts of us speaking regarding resources or
 25 something like that.

65

1 SIR JOHN SAUNDERS: You didn't give him any tactical advice?
 2 A. No, sir.
 3 SIR JOHN SAUNDERS: Thank you.
 4 Questions from MR HORWELL
 5 MR HORWELL: Mr Lawton, Operation Plato is the response to
 6 an MTFA and emergency search is a tactical plan to
 7 an MTFA?
 8 A. Yes.
 9 Q. In your view as a tac adviser, is there anything unusual
 10 or inconsistent in, first of all, declaring Plato and
 11 then setting an emergency search as the tactical plan?
 12 A. If you mean based on information that you've got, can
 13 you advise an emergency search before or after Plato's
 14 been declared? Yes, either way.
 15 Q. Thank you. In terms of the concept of a tactical plan,
 16 we can all understand that in a pre-planned operation,
 17 the tactical plan should be as detailed as necessary for
 18 the operation that is being planned.
 19 A. Yes, sir.
 20 Q. But in an emergency such as this, is it in your
 21 experience and opinion practical to have a tactical plan
 22 more detailed than an emergency search?
 23 A. In a situation like that, emergency search, no, sir,
 24 because the officers are trained to -- they obviously
 25 know all the tactics that they carry out and if you give

66

1 the officers the tactical or the deployment for
 2 emergency search, they will know what they'll need to do
 3 with the information that they've already received, like
 4 on the night there was potential for -- they believed
 5 there was a gunman in the arena. So they'd have known
 6 what they had to do without any briefing. Given that
 7 emergency search and the circumstances of what they was
 8 going in under, they would know what they was going in
 9 to do or to achieve.
 10 Q. So if I just analyse the reasons why the tactical plan
 11 has to be so short and brief, there's very little
 12 information at that stage?
 13 A. Yes, sir.
 14 Q. There is or may be an immediate threat to life from --
 15 A. Yes.
 16 Q. -- terrorists? Time is critical?
 17 A. Definitely, sir.
 18 Q. AFOs are highly trained?
 19 A. Yes, sir.
 20 Q. For just this sort of circumstance?
 21 A. Yes, sir.
 22 Q. And they are expected to use their eyes and training.
 23 And because they are on the ground, they are best placed
 24 to decide what to do?
 25 A. In the case of an emergency search like that, yes.

67

1 Based on the information they had, sir, they will have
 2 known they were going in to search and neutralise
 3 a potential marauding terrorist with a firearm within
 4 that building and they wouldn't have needed any further
 5 information than they already had to go in and carry out
 6 that task. As you say, it was time-critical.
 7 Q. And they are left to make those decisions on the basis
 8 of their experience and training and at the heart of
 9 that is the NDM.
 10 A. The NDM is in a firearms officer's mindset on every
 11 deployment that they make. We do it subconsciously,
 12 sir. The NDM is spinning around all the time. You are
 13 taking in the information what's happening straight in
 14 from of your eyes, what you are hearing on the radio,
 15 everything you are taking in, what is the threat, is
 16 there an immediate threat to a person or another person.
 17 That NDM is spinning constantly. They've already got
 18 the tactic in place that they're carrying out, they knew
 19 what they had to do when they got in there to make that
 20 place safe to save as many lives and get as many people
 21 out of there as they could do.
 22 Q. You've been asked a number of questions about your
 23 precise role that evening as tactical adviser. If the
 24 FDO had required further tactical advice from you, he
 25 could and would have asked for it?

68

1 A. Yes, sir .
 2 Q. Perhaps some of the questions that you have been asked
 3 have been put on the basis as to whether or not you're
 4 there as a critical friend of the tactical firearms
 5 commander, whether you're there to review his decisions
 6 and comment upon them. Is that your role as a tactical
 7 adviser?
 8 A. No, sir. No, it isn't.
 9 SIR JOHN SAUNDERS: Let's pause and think about that for
 10 a moment. The tactical firearms commander, at whatever
 11 stage, may well have a good deal less experience than
 12 you have of actual operational activity with guns;
 13 is that right?
 14 A. There's always going to be times, sir, when a TFC has
 15 not got as much time in that world as I've got, but they
 16 undertake different types of training to carry out their
 17 role.
 18 SIR JOHN SAUNDERS: I do understand that. If they say, "I'm
 19 going to do so—and—so", suppose in this situation the
 20 tactical commander came back to you and said, "I'm not
 21 going to direct an emergency search, I'm not going to
 22 give that high—level direction", which you would have
 23 thought was completely wrong, yes?
 24 A. Yes, of course I would, sir.
 25 SIR JOHN SAUNDERS: And you'd have said so?

1 A. I may have misunderstood the question with the critical
 2 friend. I will give him advice if he or she comes back
 3 with something that's completely off the wall, so to
 4 speak, I'd say, no, no, that's wrong, because all my
 5 tactics will have implications, what's achievable,
 6 what's not achievable, does it match with their working
 7 strategy. So it's — all the pegs have to fit in the
 8 right holes under those circumstances, but
 9 I misunderstood it as being described as a critical
 10 friend.
 11 SIR JOHN SAUNDERS: I just want to understand the dimensions
 12 of a critical friend, perhaps.
 13 MR HORWELL: You would step in if the wrong decision was
 14 made if that might have significant consequences?
 15 A. Certainly, sir. Not at command level but I'd certainly
 16 put my thought process across based on experience.
 17 Q. But otherwise are you there reviewing what is going on
 18 and what is happening?
 19 A. I am reviewing all the time because everything is
 20 changing and we may now need another tactical option or
 21 the TFC may need another tactical option and I'd be
 22 there to provide that.
 23 Q. So if you are then asked for tactical advice you'd give
 24 it?
 25 A. Yes, sir .

1 Q. And I think this was read out this morning, but from
 2 page 4 of the APP document, where tactical advice is
 3 required by a commander, this advice should be
 4 independent, the tactical adviser should be independent
 5 of the command structure and not part of the operational
 6 deployment?
 7 A. That's correct, sir .
 8 Q. So you sit away from both the operation and the
 9 commander?
 10 A. Hence why I wouldn't be involved in zoning areas off.
 11 I'm completely independent in my role.
 12 Q. In terms of the declaration of Plato, you've said that
 13 a commander may or may not discuss that with you in
 14 advance and it's for the commander to decide.
 15 A. To decide what, sorry?
 16 Q. Whether to discuss in advance of a declaration of Plato
 17 with you.
 18 A. Yes. You'll always have a discussion as a tac adviser
 19 and TFC of what is happening, what are we faced with,
 20 and the professional discussion will always be had, even
 21 if it's not written down as something you do on paper.
 22 It's just the way it works. You will be having
 23 a discussion, as we did in that draft of my statement,
 24 where I said, "Are we looking at this as a Plato?" So
 25 you'll always have that discussion.

1 Q. But the decision is the commander's?
 2 A. It is, yes.
 3 Q. You've been asked a number of questions effectively
 4 about the limitation of your role that night, the
 5 decision that the tactical advice should be that of an
 6 emergency search and it remained so throughout the
 7 night.
 8 A. No, sir. Other tactics were involved as the incident
 9 started to evolve. When we had calls from different
 10 areas coming in, there were other tactics put in place
 11 but I did not give advice on those.
 12 Q. That's what I was going to ask you about. That tactic
 13 remained the same for the arena —
 14 A. Yes, sir .
 15 Q. — because it was a building?
 16 A. Yes.
 17 Q. But as the situation developed, and let's step outside
 18 this attack, a terrorist incident within a building may
 19 develop outside the building, a terrorist in a vehicle,
 20 a terrorist on a motorbike, a terrorist in the street,
 21 and are there very different tactical responses to such
 22 incidents?
 23 A. Yes, sir . Depending on the scenario or the scene,
 24 wherever that person might be in a vehicle or on foot,
 25 out in the open, a different tactical option will be

1 used. Hence why I said emergency search is not
 2 something that you just hang on to a Plato, you can use
 3 different tactics .
 4 SIR JOHN SAUNDERS: Were you asked about that? There was
 5 a report of a possible terrorist in a vehicle .
 6 A. Yes.
 7 SIR JOHN SAUNDERS: Were you asked for the tactics?
 8 A. Not as I recall , sir , no .
 9 MR HORWELL: But AFOs are trained to stop a vehicle?
 10 A. Oh yes, sir , yes .
 11 Q. The conversation that you believe you had with
 12 Mr Sexton, you've been asked a number of questions about
 13 that. Did it take place before he declared Plato?
 14 A. I believe it did because my recollection of the
 15 conversation is discussing whether it was going to be
 16 declared or not, whether he was going to declare it as
 17 a Plato incident , so it would have been before, yes .
 18 Q. And therefore it would seem if it took place, it must
 19 have taken place before he switched his dictaphone
 20 machine on, which was just before the declaration was
 21 made?
 22 A. I can only assume so, sir .
 23 Q. You had a number of conversations with Mr Sexton on the
 24 night?
 25 A. Yes .

1 Q. How did he appear?
 2 A. Mr Sexton, I think we've heard from his radio
 3 transmissions, I found him to be very calm, very
 4 professional , in control of what he was doing. I found
 5 him to be quite a steady hand. He came across to me
 6 that way. He never came across as though he was
 7 flapping or stressing out. Obviously we were all under
 8 a great amount of stress, but he seemed to be in control
 9 and to know what was going on around him .
 10 MR HORWELL: Thank you, Mr Lawton, that's all I ask .
 11 SIR JOHN SAUNDERS: Thank you .
 12 Thank you very much for coming to give your evidence
 13 and helping us with your expertise .
 14 A. Thank you, sir .
 15 SIR JOHN SAUNDERS: Shall we break now for coffee?
 16 MR DE LA POER: Yes .
 17 SIR JOHN SAUNDERS: 15 minutes, thank you .
 18 (11.20 am)
 19 (A short break)
 20 (11.44 am)
 21 MR GREANEY: Good morning, sir. The next witness is
 22 Constable Lee Moore, to whom we've seen reference
 23 already in the audio schedules. Could Constable Moore
 24 be sworn, please?
 25

1 PC LEE MOORE (sworn)
 2 Questions from MR GREANEY
 3 MR GREANEY: Tell us your full name, please?
 4 A. Lee Anthony Moore .
 5 Q. Are you a police constable with Greater Manchester
 6 Police?
 7 A. I am .
 8 Q. In May 2017, were you an authorised firearms officer?
 9 A. I was .
 10 Q. And also an operational firearms commander?
 11 A. I was .
 12 Q. In that year, for how long had you been a police
 13 officer ?
 14 A. In 2017 it would have been 13 years .
 15 Q. For how long had you been a AF0?
 16 A. It would be 6 years at that point .
 17 Q. For how long had you been an OFC?
 18 A. About 6 months at that point as well .
 19 Q. Did you join Greater Manchester Police after service in
 20 the British Army?
 21 A. I did, yes .
 22 Q. I don't want to go into the details of your service , nor
 23 should anyone else, but did that service mean that you
 24 had some familiarity with bombs?
 25 A. Yes, it did .

1 Q. On Monday, 22 May, were you working?
 2 A. I was, yes .
 3 Q. Were you working a night shift?
 4 A. I was, yes .
 5 Q. Did you get to the premises at which you worked at about
 6 8.30 in order to prepare for the shift that started at
 7 9 pm?
 8 A. I did, yes .
 9 Q. Did you receive a briefing at 9 pm?
 10 A. Yes, I will have .
 11 Q. During the course of your shift was it intended that you
 12 should be tasked with supporting a particular division
 13 of GMP with the potential for force-wide cover for
 14 a response to an incident?
 15 A. Yes, that's correct .
 16 Q. At round about 10.30 that night, were you still at the
 17 premises from which you operated?
 18 A. I was, yes .
 19 Q. And were you with your partner for that shift?
 20 A. It was yes, PC Simkin .
 21 Q. Were you monitoring the firearms dedicated radio
 22 channel?
 23 A. Yes, I was .
 24 Q. And at that time, so round about 22.30, what came to
 25 your attention as you listened to that channel?

1 A. We received reports of some form of explosion or shots
 2 fired , et cetera , from the arena or an incident , should
 3 I say , at the arena.
 4 MR COOPER: I am so sorry, sir, I'm getting indications from
 5 those I represent they're having difficulty hearing the
 6 witness. I wonder if he could keep his voice up.
 7 A. Sorry, sir --
 8 SIR JOHN SAUNDERS: I don't want you to have to speak
 9 unnaturally loudly or anything like that, but if you
 10 move your chair forward a bit, would you mind, the
 11 microphones will pick you up and they'll amplify you
 12 more?
 13 MR GREANEY: Thank you, Mr Cooper.
 14 You were telling us that at about 22.30, you were at
 15 your base with your partner, PC James Simkin, monitoring
 16 the dedicated firearms channel when you heard
 17 information about an incident at the arena, including
 18 that there had been an explosion and, I think this is
 19 the position, possibly with gunshots.
 20 A. Yes, that's correct.
 21 Q. Was that information that was being broadcast by the
 22 force duty officer or FDO?
 23 A. I'm unaware of that at that time, sir, but it was
 24 broadcast on our channel.
 25 Q. At all events that was the information that you

77

1 received?
 2 A. Yes, sir.
 3 Q. Were you deployed or did you self-deploy to the
 4 incident?
 5 A. Initially , we'd have gone straight to the vehicle and
 6 started to move but then we were given an authority to
 7 deploy.
 8 Q. From whom did you receive that authority?
 9 A. It was from the FDO, sir.
 10 Q. When you say authority to deploy, are you talking about
 11 the formal firearms authority about which we have heard
 12 or something different?
 13 A. Yes, it would have been a firearms authority.
 14 Q. So you get moving straightaway before you've been
 15 directed at all . Whilst you were on your journey to the
 16 arena, you get that formal authorisation?
 17 A. Yes.
 18 Q. Did you discover also whilst you were on your way that
 19 Constable Richardson was to be the operational firearms
 20 commander for the firearms response?
 21 A. Yes, sir . He would have volunteered for that.
 22 Q. Did you and PC Simkin travel directly to the arena in
 23 your ARV?
 24 A. Yes, sir .
 25 Q. Which of you was driving?

78

1 A. PC Simkin.
 2 Q. On arrival did you park your vehicle on Station
 3 Approach?
 4 A. Yes.
 5 Q. Had you prepared your weapons on the way so that on
 6 arrival you were able to leave your vehicle
 7 straightaway?
 8 A. Yes, sir , we had a centre(?) safe for the guns.
 9 Q. In a moment I'm going to take steps with the
 10 contemporaneous material to time your arrival. First of
 11 all , I want to seek your narrative evidence about the
 12 position on Station Approach and then within the station
 13 itself , but not the City Room, when you first arrived.
 14 First then, having arrived on Station Approach and
 15 having left your vehicle, what was the position on that
 16 road?
 17 A. We were facing towards the MEN Arena, so we were outside
 18 Victoria Station, facing towards the arena itself .
 19 Q. Were there people on Station Approach?
 20 A. Yes, there were, there was quite a lot of people, a lot
 21 of members of the public and some police officers,
 22 et cetera, ambulance staff.
 23 SIR JOHN SAUNDERS: Police officers and ambulance staff?
 24 A. Yes, sir , there were some medics at the scene.
 25 MR GREANEY: That's your recollection at any rate?

79

1 A. Yes, it is .
 2 Q. Did you see that there were members of the public, some
 3 walking, some running?
 4 A. Yes, sir .
 5 Q. Many clearly in shock?
 6 A. Yes, sir .
 7 Q. With some sense of panic?
 8 A. Yes, sir .
 9 Q. And did you note, even at that early stage, that some
 10 people were obviously injured?
 11 A. Yes, there was some members of the public that had some
 12 blood on them, et cetera.
 13 Q. As we're going to see, you then went into the station
 14 itself ; is that correct?
 15 A. That's correct .
 16 Q. I believe it 's the position that you entered through the
 17 war memorial entrance?
 18 A. Yes.
 19 Q. As you entered and were able to see the scene on the
 20 ground floor concourse, what did you note?
 21 A. You could see that there were members of the public,
 22 emergency services, et cetera, dealing with casualties
 23 that were inside of Victoria Station on the floor at
 24 that point, sir .
 25 Q. So in simple terms, as soon as you arrived , it was clear

80

1 that something very significant indeed had happened?
 2 A. Yes, sir, it was.
 3 Q. Let's come on to deal with timings in a little more
 4 detail. In your witness statement, which is dated
 5 13 February 2019 and which has the INQ reference
 6 {INQ022619/1}, you say the following:
 7 "I can't fully recall the exact chronology of the
 8 events or the full extent of my actions in response to
 9 the arena attack, but I have recalled many of my actions
 10 and the main people I had contact with."
 11 And you were making, it seems, the perfectly
 12 understandable point that you were there giving
 13 a narrative account and you couldn't remember every last
 14 detail and every particular time; is that correct?
 15 A. That's correct, sir, because it was 2 years after the
 16 incident I gave the statement.
 17 Q. You are softly spoken. I am just going to check that
 18 people can hear. Just about.
 19 SIR JOHN SAUNDERS: I'm normally the one who can't hear
 20 first. I'm managing at the moment.
 21 A. Sorry, sir, I'll try and speak up.
 22 SIR JOHN SAUNDERS: Thank you.
 23 MR GREANEY: What I know you will appreciate is we now have
 24 access to sources of evidence, so radio recordings and
 25 CCTV footage, that you did not have access to at the

81

1 time at which you prepared your statement.
 2 A. That's correct.
 3 Q. And we have been able to develop a really very clear
 4 picture of things such as the time you arrived. Does
 5 that make sense?
 6 A. Yes.
 7 SIR JOHN SAUNDERS: I've heard from another witness that he
 8 was urged not to make a detailed note or advised not to
 9 make a detailed note in his notebook. Were you given
 10 the same advice?
 11 A. It was basically along the lines of a PIP process, sir,
 12 that we carry out in firearms, which is a post-incident
 13 procedure, where we're advised just to produce duty
 14 statements at that time that we were there at the
 15 incident, et cetera, but not in detail. At a later date
 16 we would give a detailed statement when requested to.
 17 SIR JOHN SAUNDERS: So this is standard procedure --
 18 A. It is, yes, part of --
 19 SIR JOHN SAUNDERS: -- for firearms officers?
 20 A. -- as I say, what we call the PIP process.
 21 MR GREANEY: So it wasn't your view that you were being
 22 asked to do or instructed to do anything that was
 23 remotely sinister?
 24 A. No, sir, not at all.
 25 Q. Was the upshot, I know that you did prepare -- you

82

1 answered a debrief questionnaire, I think.
 2 A. Yes.
 3 Q. There isn't very much information in there. Was the
 4 upshot that the first time you provided any detailed
 5 account in writing of the incident was on
 6 13 December 2019, when you made the witness statement to
 7 which I've referred?
 8 A. It is, yes.
 9 SIR JOHN SAUNDERS: 13 February.
 10 A. The actual notes I think were taken earlier.
 11 MR GREANEY: You're quite right, sir. At all events, it's
 12 some considerable period after the events that we're
 13 dealing with?
 14 A. Yes.
 15 Q. So as I said, we do have access to other sources of
 16 evidence that you don't have. So we have what I believe
 17 to be a clearer picture and I'm going to work through
 18 that with you so that you can help us with what was
 19 happening at various times.
 20 I'm going to begin by identifying the time at which
 21 you arrived within the railway station and who was there
 22 when you did. For reasons that will become clear, I'm
 23 going to begin by tracking through the movements of
 24 someone that is not you, but instead is a BTP officer
 25 called Constable Carl Roach. Mr Lopez, this is

83

1 {INQ035612/40} first of all.
 2 We can see that at 22.36, BTP Officer Carl Roach is
 3 running into Victoria Station, the railway station,
 4 carrying a large first aid kit bag.
 5 A. Yes.
 6 Q. He's running in through the war memorial entrance as
 7 well, so 22.36. Let's see where he goes.
 8 {INQ035612/41}, please.
 9 He's making his way immediately to the staircase
 10 that leads to the overbridge. Still 22.36.
 11 {INQ035612/44}, please.
 12 He's made his way now up the staircase and he's
 13 in the bottom picture at 22.36.39 on the overbridge
 14 running, it seems, towards the City Room.
 15 Now next, please, {INQ035612/51}. 22.37.38, so
 16 about 1 minute later, he runs back along the footbridge
 17 making his way downstairs to the main station.
 18 SIR JOHN SAUNDERS: Without the bag.
 19 MR GREANEY: Without the bag, indeed, sir. I think we're
 20 going to see why in a moment.
 21 {INQ035612/54} next, please. Then at 22.38 we can
 22 see that he approaches Northern Rail staff and it is
 23 believed that he's asking for more first aid equipment
 24 because the persons to whom he speaks immediately run
 25 away to obtain some, and he then exits the station

84

1 outside on to Station Approach.
 2 So the position is that PC Roach has been into the
 3 City Room, at least once, he's seen the horror there and
 4 then he has returned to the war memorial entrance area
 5 and on to Station Approach. That was at 22.38.
 6 We next see him at 22.42.52. That's an important
 7 time and an important image because I believe it shows
 8 your arrival within the station. So 22.42.52. Let's
 9 look at that image. It's {INQ035612/78}.
 10 It's now 22.42.52, that time I gave. BTP PC
 11 Carl Roach, who is seen exiting the station at 22.38.10,
 12 we have just seen that, re-enters along with two GMP
 13 firearms officers who are not named in the image.
 14 These are the first firearms officers to enter the
 15 station from any direction. Is this making sense so
 16 far?
 17 A. Yes.
 18 Q. In that image can we see you and PC Simkin?
 19 A. Yes.
 20 Q. And you are with or alongside PC Roach and he is facing
 21 towards you and apparently pointing, do you agree?
 22 A. Yes.
 23 Q. Which officer are you? The one in the lead or the one
 24 behind?
 25 A. The one in the lead going for my radio there, sir, with

85

1 my hand.
 2 Q. It's perhaps important that you refer to going for your
 3 radio because I think we're going, in a few moments, to
 4 look at a message that you passed.
 5 Against that background, having identified your
 6 arrival into the station at 22.42.52 and having
 7 identified that you are alongside PC Roach, who appears
 8 to be communicating with you, we can look at the
 9 schedule of audio communications that I believe you have
 10 seen, have you not?
 11 A. Yes, sir.
 12 SIR JOHN SAUNDERS: Just before we go to that, we know,
 13 you have told us, that you discovered Mr Richardson was
 14 to be the OFC.
 15 A. Yes, sir.
 16 SIR JOHN SAUNDERS: There are, we know, a number of you who
 17 are qualified as OFCs.
 18 A. Yes, sir.
 19 SIR JOHN SAUNDERS: One of the criteria of being OFC
 20 presumably is whoever is going to be first?
 21 A. No, sir, not necessarily, because there's plenty of
 22 times that somebody would take command of that operation
 23 as the OFC and others will arrive first to give them
 24 updates, et cetera, and get a foot on the ground and
 25 information.

86

1 SIR JOHN SAUNDERS: Is it a selection process as to who's
 2 the OFC or is it simply whoever volunteers or puts their
 3 name forward?
 4 A. It's dependent on teams, sir. For a time there was only
 5 myself and another colleague who were qualified OFCs, so
 6 we'd run together alternate — he was available, if he
 7 was detailed on another task, but on the night it was
 8 whoever shouted up and, if I may, sir, at the time,
 9 I know I was first on scene, the reason I wouldn't take
 10 it over from PC Richardson at that time is because all
 11 the information and communications on the radio channels
 12 to the FDO and everything that was going to the FDO,
 13 I didn't want to then confuse matters. He'd already
 14 allocated him as the OFC, I didn't want — which will
 15 become apparent in a bit as we progress on.
 16 SIR JOHN SAUNDERS: We know the FDO didn't know
 17 Mr Richardson, we have heard that, so it must be just
 18 first come, first served in a way?
 19 A. Yes, sir, on that night yes.
 20 SIR JOHN SAUNDERS: Presumably the FDO would need to know
 21 that whoever's put their name forward is going to get
 22 there fairly soon?
 23 A. Yes.
 24 MR GREANEY: To be fair to PC Richardson, he was to arrive
 25 in the City Room only a short time after you.

87

1 A. Yes. Normally, sir, (inaudible: distorted) what we
 2 should do as OFC is we would find the location or be
 3 given the location of the incident and, as you say,
 4 whoever's closest would try and oversee it that way and
 5 would deal with it. And PC Richardson was actually out
 6 on the ground at the time, I was back in the unit, hence
 7 why he volunteered to take the job on.
 8 SIR JOHN SAUNDERS: I wasn't trying to be unfair to
 9 Mr Richardson.
 10 MR GREANEY: I didn't think you were, sir, and I don't
 11 believe anyone is going to criticise you for not seeking
 12 to take over the role of OFC.
 13 SIR JOHN SAUNDERS: No, no, it was really a matter of
 14 getting to know what the procedure was and why it
 15 happened in that way.
 16 MR GREANEY: Indeed the two of you, you and
 17 Constable Richardson, were to make a decision that he
 18 would effectively remain at the scene as OFC and you
 19 were to take on a separate but also very important
 20 responsibility of supervising the search of the
 21 premises.
 22 A. That's correct.
 23 Q. We'll get to that in due course.
 24 So where we were was that you, at 22.42.52, with
 25 PC Simkin arriving into the station and alongside you

88

1 and communicating with you is PC Roach of BTP.
 2 Against that background, we can look at the schedule
 3 of radio communications and work out what is happening
 4 at various times.
 5 SIR JOHN SAUNDERS: It looks like he's pointing you in the
 6 right direction, Mr Roach; is that right?
 7 A. He is, sir.
 8 MR GREANEY: The first entry, number 1683, timed at
 9 22.39.30. It's a message that we looked at with
 10 PC Richardson yesterday. The first part of what he says
 11 is cut off, he believed he said something like "I have
 12 been told". It reads — Richardson:
 13 "That it's actually fireworks that have been going
 14 on. We've got nothing confirmed so far and there is no
 15 sound but we're just trying to get the public out of the
 16 way."
 17 And what we know is that at that time he's on
 18 Trinity Way.
 19 A. Yes, the opposite side, sir.
 20 Q. You are then heard on the radio saying:
 21 "Is that you, Eddie?"
 22 And PC Richardson says:
 23 "Yes, yes."
 24 Do you agree, bearing in mind the time at which you
 25 enter the station, it seems that you must have been

89

1 either on your way to the arena or perhaps just outside
 2 at that time?
 3 A. Yes, sir.
 4 Q. The next entry down is 1788 and is timed at 22.41.43.
 5 So this is just over 1 minute before we see you inside
 6 the station. I will read this out because it's
 7 important. As you know, it contains a reference to
 8 Plato. I'm not going to pause at this moment to ask you
 9 about that, we will come back to it. Let's see what
 10 messages were being passed just a minute before you
 11 entered the station.
 12 Moore:
 13 "Boss, it's become a different story now. There's
 14 no — still members of the public coming out, nobody..."
 15 So is this a communication that you're having over
 16 the radio with the FDO?
 17 A. Yes, it is.
 18 Q. Mr Sexton, the FDO replies:
 19 "Yes. Received the last — obviously still ..."
 20 Someone then interjects:
 21 "The MEN."
 22 The FDO asks you:
 23 "Sorry, say that again. You broke up."
 24 And you say:
 25 "I'm with a BTP officer now. We're going up to the

90

1 upper floor of the MEN, basically they've got major
 2 casualties."
 3 And Mr Sexton replies:
 4 "Yes, received. Definitely casualties."
 5 And you say then:
 6 "Operation Plato, Operation Plato."
 7 A. Yes.
 8 Q. So can I just make sure that I've correctly understood
 9 what seems to be happening. You have said, "It's
 10 a different story now", so you seem to be saying it's
 11 a different story from what Mr Richardson had broadcast
 12 based on what he knew. Have I understood that
 13 correctly?
 14 A. Yes, that's correct.
 15 Q. It appears that by that stage you have spoken to a BTP
 16 officer?
 17 A. Yes.
 18 Q. In context do you think that must have been PC Roach?
 19 A. Yes, I would say so, sir, because I only spoke to one
 20 officer as I gained entry to Victoria Station.
 21 Q. He's told you that there are major casualties on the
 22 upper floor and you have made the FDO aware of that
 23 straightaway?
 24 A. Yes, sir.
 25 Q. Bearing in mind the timing, you must have arrived,

91

1 at the stage that you passed that message, but would
 2 have been just outside on Station Approach; does that
 3 seem correct?
 4 A. Yes, sir. It'd have been as I gone in, like the CCTV
 5 shows, at that point as I have spoke to him as I have
 6 gone in.
 7 Q. The precise timing to the second may not be important
 8 but this is 1 minute and 9 seconds before we see you
 9 inside. So you are probably just outside —
 10 SIR JOHN SAUNDERS: And the clocks are completely
 11 synchronised, are they?
 12 MR GREANEY: That's a very sound question. My expectation
 13 has been yes because there should have been and I'm
 14 confident, given the work of Manteline, there will have
 15 been calibration, but we'll make sure there's an answer
 16 to that question.
 17 SIR JOHN SAUNDERS: I don't think it matters hugely where
 18 the conversation took place. It just actually looks, if
 19 you were just looking at the pictures and the details of
 20 the transcript, that you might think actually that
 21 he was in the station by the time this happened but...
 22 MR GREANEY: I think the next entry that we're going to look
 23 at —
 24 SIR JOHN SAUNDERS: Is going to clarify everything?
 25 MR GREANEY: May clarify. At all events, as the chairman

92

1 said, it doesn't matter whether you were outside or just
2 inside. The important point is you're passing the
3 information you have straightaway to the FDO and you're
4 saying, "Operation Plato, Operation Plato", to which
5 we'll come back.

6 The third entry on this page, 1856, is timed at
7 22.43.05. So this is 13 seconds after the image that
8 we have looked at and it is therefore, assuming the
9 timings are calibrated, it's before you're on the
10 overbridge, let alone before you'd entered the
11 City Room. So it's very shortly after the image that
12 we've seen in which, as you pointed out, you're reaching
13 for your radio.

14 A. Sir.

15 Q. Let's see what's said. PC Richardson says:
16 "Just confirm what you have heard, please."

17 Is he asking you to confirm what you've been told by
18 the BTP officer?

19 A. Yes, just to relay it again, relay the message.

20 Q. Because as we know from his evidence and the images we
21 looked at of him, he is not by that stage in the
22 City Room.

23 A. No, sir.

24 Q. And you say:
25 "I'm with a BTP officer now. We're going up to the

1 upper floor of the MEN. It's stated they've got major
2 casualties upstairs in the MEN and they believe it's
3 a ball bearing device. Stand by for further."

4 FDO replies:

5 "Yes, received."

6 You then state:

7 "Boss, I can confirm there's definitely casualties."

8 FDO:

9 "Yeah, received, definitely casualties."

10 Downes, who I think is another firearms officer,
11 states:

12 "We've still got ARVs making to scene. Can we have
13 the correct place to go to, please? So, entry into that
14 location."

15 And you then say:

16 "Boss, confirmed, yes, yes. Operation Plato,
17 Operation Plato."

18 And Mr McGovern, another firearms officer, says:

19 "Just confirm where I'm going to, please."

20 You would seem certainly to be within the station at
21 that time and again you're passing the information that
22 you have, there are casualties, there appears to have
23 been some form of shrapnel device, and you're saying,
24 "Operation Plato, Operation Plato". And this, as I am
25 certain you will know, is before the formal declaration

1 of Operation Plato by the FDO?

2 A. It is, sir, yes.

3 Q. In your witness statement you describe Operation Plato
4 in the following terms -- and, sir, this is page 3 --
5 and I'm going to quote your words. It's the large
6 paragraph in the middle of that page. You say this:

7 "Operation Plato is a set response to a terrorist or
8 potential terrorist attack where there is a possibility
9 of a secondary device or more offenders potentially
10 involved in random shootings."

11 As I've read that, I've emphasised the word "or" and
12 I want to find out from you whether I was correct to do
13 so. Does what you have said in your statement mean that
14 your understanding in May 2017 was that Plato was an
15 appropriate declaration where there had been a terrorist
16 attack and it was possible that there was a secondary
17 device, whether there was an active shooter or not?

18 A. No, (inaudible) an active shooter, sir.

19 Q. So it was your understanding that Operation Plato,
20 I don't wish to put words in your mouth, but I think
21 this is what you're saying, Operation Plato was the
22 operation that was a response not to any terrorist
23 attack, if you understand what I mean, but was an
24 operation to be declared in response to a particular
25 form of terrorist attack, namely an MTFA?

1 A. Yes, as the name says, marauding terrorist firearms
2 attack.

3 Q. So that was your understanding in May 2017?

4 A. Yes, sir.

5 Q. Whatever others may have thought, that's what you knew.
6 For whose benefit or attention were you saying,
7 "Operation Plato"?

8 A. For the FDO, sir.

9 Q. Why were you saying that at that stage?

10 A. Because of the information and intelligence that we
11 received en route and the confirmation that an attack
12 had taken place, I suspected, as the information was
13 given that there were shootings at the same time,
14 I therefore deemed that it would be an Operation Plato
15 situation and to advise the FDO of that and the
16 information. It made it more of a succinct
17 communication to the FDO because of the traffic that was
18 happening at that time.

19 Q. We've listened to the recording and it certainly had the
20 benefit of communicating what you thought you were
21 dealing with.

22 A. Sir.

23 Q. Obviously, at that time, you hadn't seen a gunman,
24 indeed there was no gunman. But it seems from what
25 you're saying, this would in any event seem sensible,

1 that one isn't saying it's Operation Plato because
 2 there's definitely a gunman, one is saying it's
 3 Operation Plato in circumstances where there is
 4 a terrorist attack and there is a material possibility
 5 that there may be a gunman?
 6 A. Yes, a report had come in that there had been shootings,
 7 there had been the sound of gunfire, and that's what
 8 I took that from.
 9 Q. Thank you.
 10 SIR JOHN SAUNDERS: Those reports, you'd heard them in the
 11 car coming in?
 12 A. Yes, on the radio.
 13 SIR JOHN SAUNDERS: Or you got them when you were there?
 14 A. I think it was on the car as we were coming in, sir, but
 15 I can't be definitive about that.
 16 SIR JOHN SAUNDERS: Thank you.
 17 MR GREANEY: Let's move to the following period. You'll
 18 appreciate I don't want to go into detail about what you
 19 saw, really for the sake of everybody, including you,
 20 but principally the families.
 21 Did you run through the railway station, up the
 22 stairs and on to the overbridge?
 23 A. Yes, sir.
 24 Q. Were there injured people on the overbridge?
 25 A. There was walking wounded coming from that direction at

1 that time.
 2 Q. Did you then enter the City Room?
 3 A. I did, sir, yes.
 4 Q. Were you and PC Simkin the first armed officers in
 5 there?
 6 A. Yes, sir.
 7 Q. Was it apparent to you that there were dead and injured
 8 within the room?
 9 A. Yes.
 10 Q. Did you see BTP officers?
 11 A. I did, sir, yes.
 12 Q. Arena staff?
 13 A. Yes, sir.
 14 Q. And members of the public?
 15 A. Yes, sir.
 16 Q. Before I ask you what you did, out of really fairness to
 17 you and the other AFOs who were to enter that room, I'm
 18 going to read out the final paragraph of your witness
 19 statement and you know that I'm going to do this, don't
 20 you?
 21 A. Yes, sir.
 22 Q. I hope this is not going to upset you and I hope
 23 everybody understands why I consider it important to
 24 read this out. You say:
 25 "I can say that the events of that night will last

1 with me forever. Nothing could have prepared me for
 2 what I saw and what I had to deal with that night. My
 3 job as a firearms officer was to make the arena safe by
 4 ensuring that the threat of a secondary device or
 5 a gunman was fully eliminated to prevent any further
 6 casualties or loss of life. This meant that we were
 7 unable to stop and give first aid to the casualties. We
 8 had to make sure the foyer and the arena was safe for
 9 people to be in."
 10 And does that represent the position?
 11 A. It does, sir, yes.
 12 Q. And you add:
 13 "It was the worst feeling, not to be able to help
 14 those injured and not being able to help other
 15 colleagues dealing with the casualties and the deceased
 16 victims. I fully understand my role as a firearms
 17 officer in that situation, but I cannot express the
 18 feeling of having to perform my role whilst there are
 19 injured people. My only solace was that there were
 20 personnel in support conducting first aid and further
 21 support was arriving. I had to make sure that the
 22 threat had been eliminated and that there was no further
 23 danger to those in support or those already injured."
 24 And does that represent your thought processes and
 25 indeed your feelings?

1 A. Yes, sir.
 2 Q. Let's turn to deal then with what you in fact did once
 3 you arrived in the City Room. Did you carry out, as the
 4 first officers within that area, what you described as
 5 a raw check?
 6 A. Yes, I did, yes.
 7 Q. What is a raw check, please?
 8 A. It would have just been, as we passed through the
 9 City Room, a visual check of the surroundings,
 10 et cetera, to ensure that there was obviously no further
 11 threat in that area by personnel.
 12 Q. So this is a visual check?
 13 A. Yes, sir.
 14 Q. And I think we've understood it's designed to make sure
 15 that the City Room was clear from a secondary device?
 16 A. Yes, sir.
 17 Q. And from a gunman?
 18 A. Definitely from a gunman, sir. The secondary device, it
 19 would have just have been a quick visual check, not an
 20 actual detailed one.
 21 Q. I'm certain we'll understand that spotting a gunman is
 22 one thing, but in these circumstances being sure there's
 23 no secondary device is a different matter altogether, is
 24 it not?
 25 A. Yes, sir.

1 Q. So were you excluding the possibility of a gunman in the
 2 City Room and doing what you could to exclude the
 3 possibility of a secondary device?
 4 A. Yes, sir.
 5 Q. I'm going to ask you about the City Room and your view
 6 about it in one moment, but first of all in your witness
 7 statement, and indeed in a broadcast that night that you
 8 made, you referred to a rucksack.
 9 A. Yes.
 10 Q. A black rucksack. First of all, did you see such
 11 a rucksack?
 12 A. Yes, sir.
 13 Q. Second, where was it?
 14 A. It was outside of the foyer on the concourse, sir, near
 15 to the doors.
 16 Q. So do you mean not in the City Room but on the arena
 17 side concourse?
 18 A. Yes, sir.
 19 Q. So you've been through the City Room from the
 20 overbridge, through the doors that lead to the arena,
 21 and the rucksack is on that concourse?
 22 A. Yes, sir.
 23 Q. Did it seem out of place to you?
 24 A. It did, sir, yes, because it was like a day sack, if
 25 I can explain that, it was like a military — a small

101

1 Bergen—type bag, not something that you'd expect to see
 2 at a concert, like a handbag or a shoulder bag, or
 3 something along them lines.
 4 Q. As we're going to see, you were at pains to ensure that
 5 others were aware of that and the need to make sure it
 6 was checked?
 7 A. Yes, sir.
 8 Q. As for the City Room, leaving the rucksack for one side
 9 for a moment, on your raw check were you satisfied or as
 10 satisfied as you could be that the room was clear?
 11 A. Yes, sir.
 12 Q. Having done that raw check, did you consider that the
 13 City Room was safe or less than safe?
 14 A. It's quite hard to say safe or not safe, sir. If you
 15 could say medium as in I was happy there was no active
 16 shooter in there. In relation to a secondary device,
 17 I'd had a look, but it needed a more detailed search to
 18 confirm there wasn't any secondary device. In relation
 19 to that imminent threat of an active shooter, yes, I was
 20 happy that area was safe.
 21 Q. That's a very clear and comprehensible answer.
 22 SIR JOHN SAUNDERS: Would you give me a bit more description
 23 about the search? Did you split up or did you remain
 24 together?
 25 A. We remained together, sir, and we do what we call

102

1 back—to—back, so my partner would be looking to the left
 2 or right and I would be looking to the left or right.
 3 SIR JOHN SAUNDERS: I don't need to know details that
 4 I shouldn't know or we shouldn't make public. I'm just
 5 talking about the search of the area. We obviously have
 6 some idea of the geography of the City Room now.
 7 There's a ground floor area you and went all round that?
 8 A. It would have been as we passed through, so it would
 9 have been a quick visual check on either side as best we
 10 could to get through to the other side.
 11 SIR JOHN SAUNDERS: And you could see reasonably as well?
 12 A. Yes, sir, because as I say, obviously my tasking at that
 13 time for the authority I had been given was obviously to
 14 identify, locate, confront and neutralise, so what I'm
 15 looking for is this active shooter initially.
 16 SIR JOHN SAUNDERS: We know there's a mezzanine.
 17 A. Yes, sir.
 18 SIR JOHN SAUNDERS: Did you go up there?
 19 A. No, sir.
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR GREANEY: We know that one of the defining features of
 22 Operation Plato is the designation of different zones as
 23 hot, warm and cold. I don't need to go through with you
 24 what those mean. Were you aware on 22 May of the
 25 concept of Plato zoning?

103

1 A. Yes, sir.
 2 Q. To your mind whose job that night was it, on Plato
 3 having been declared, to decide which areas fell within
 4 which zones?
 5 A. That would have been the FDO, sir, on guidance from the
 6 AFO/OFC on the ground.
 7 Q. So it wasn't your job to decide whether a particular
 8 area was hot or warm?
 9 A. No, sir.
 10 Q. But nonetheless did you give any thought at this time to
 11 the zoning?
 12 A. It did come into my mind, sir, as in not particularly
 13 zoning, but areas, as you stated, that were safe, that
 14 we could deal with, because as it progresses— I'm sure
 15 you will cover that in a minute.
 16 Q. I don't want to go into a huge amount of detail about it
 17 but did you think as you were in there that the
 18 City Room was a hot zone?
 19 A. Initially, sir, until we cleared through and then in my
 20 mind I'd classed that then as a warm zone.
 21 Q. So once you'd done your raw check, it was a warm zone —
 22 A. Yes, sir.
 23 Q. — to you?
 24 A. Yes, sir.
 25 Q. Did anyone that night ever discuss Plato zoning with

104

1 you?
 2 A. No, sir.
 3 Q. I think it was around --
 4 SIR JOHN SAUNDERS: Sorry. The search through, the
 5 immediate search, roughly how long do you think it took?
 6 A. Five, 10 seconds at most, sir. The time it took for me
 7 to progress from the Victoria Station side into the
 8 arena side. It was a very quick visual search of that
 9 area.
 10 SIR JOHN SAUNDERS: You had concluded in your own mind that
 11 it was a warm zone within a minute of going in there?
 12 A. Yes, sir.
 13 SIR JOHN SAUNDERS: Thank you.
 14 MR GREANEY: We're probably talking, bearing in mind you
 15 enter the station at a run at 22.42.52, we're probably
 16 talking about -- well, by 22.45 or thereabouts you have
 17 done your raw check and come to your view.
 18 A. Yes. To be honest, we constantly, as AFOs, have to
 19 carry out dynamic risk assessments and although I hadn't
 20 done a secondary confirmation search of the area, as
 21 in the mezzanine/looking for secondary devices, my
 22 dynamic risk assessment of the foyer of that area at
 23 that time was it was a warm zone and we'd be able to
 24 bring in medics, which my communications show in a bit.
 25 SIR JOHN SAUNDERS: You're the best person to make that

105

1 decision?
 2 A. At that time, sir, I'd say yes, because I'd been through
 3 there.
 4 SIR JOHN SAUNDERS: But you actually had no input into it at
 5 all, the zoning?
 6 A. Not zoning, sir, no.
 7 SIR JOHN SAUNDERS: Thank you.
 8 MR GREANEY: And I think, as you have said, from that point
 9 in time you were keen, to put it mildly, that people
 10 should enter that area and provide treatment to those
 11 who needed it?
 12 A. Yes, sir. I definitely communicated that back on the
 13 radio and requested medics, extra trauma kit, et cetera,
 14 et cetera.
 15 Q. I'm not going to go through all of your communications,
 16 bearing in mind what we need to try to get through this
 17 week. They're all there for us to read and no one will
 18 have any doubt about the efforts that you made.
 19 SIR JOHN SAUNDERS: You're saying "We need ambulances, we
 20 need help, we need whatever" --
 21 A. I have requested medics, trauma kits, et cetera --
 22 SIR JOHN SAUNDERS: Are you saying where?
 23 A. Yes, sir, the top of Victoria Station --
 24 SIR JOHN SAUNDERS: So you are saying the location as well?
 25 A. Sir.

106

1 SIR JOHN SAUNDERS: Thank you very much?
 2 MR GREANEY: I've had a very helpful message from Mr Suter.
 3 It answers a point that, sir, you enquired about
 4 earlier. All of the sequence of event documents that
 5 we have provided show calibrated times. The maximum any
 6 disclosed sequence of events is out is up to 12 seconds.
 7 SIR JOHN SAUNDERS: I'm really grateful for that and I'm
 8 very grateful for the considerable efforts which must
 9 have been made to calibrate all these times together.
 10 MR GREANEY: Sir, there is no doubt that a vast amount of
 11 work has been done --
 12 SIR JOHN SAUNDERS: Mr Cooper, do you want to talk about
 13 calibration?
 14 MR COOPER: No, sir, not on that. I have just spoken to
 15 Mr Atkinson as well, just to make sure I am not standing
 16 inappropriately. I wonder whether Mr Greaney could
 17 clarify, because we haven't got the document in front of
 18 us, when the request is being made by this witness for
 19 medical assistance, precisely to whom that request is
 20 being made.
 21 MR GREANEY: I'm sure we'll get to it in due course. It may
 22 not be during my first phase of questioning. I'm just
 23 trying to --
 24 SIR JOHN SAUNDERS: It may be the lunchtime break --
 25 MR COOPER: If it's coming later, of course that's fine,

107

1 just at some stage --
 2 SIR JOHN SAUNDERS: Absolutely.
 3 MR GREANEY: Of course, Mr Cooper.
 4 I think what we'll probably do is I'll take this
 5 just a little further and then we'll have a break and
 6 then we'll return to that, to the entries in the
 7 schedule after lunch.
 8 At about the time at which you were concluding your
 9 raw check, were other firearms officers arriving?
 10 A. Yes, they was, yes.
 11 Q. Including PC Richardson, the OFC?
 12 A. Yes, sir.
 13 Q. And his partner?
 14 A. Yes, sir, PC Adams.
 15 Q. We know it was PC Lewis.
 16 A. His name is Lewis Adams, sir, so it's PC Adams.
 17 Q. I spent yesterday calling him PC Lewis. Your colleague
 18 PC Simkin was there?
 19 A. Yes.
 20 Q. PC Depono?
 21 A. Yes.
 22 Q. I have probably mispronounced his name as well.
 23 PC Edwards, PC Hughes, PC Reddican, PC Caton,
 24 PC Charlton, and PC Downes?
 25 A. Yes, sir.

108

1 Q. Did you give those officers a verbal briefing?
 2 A. Yes, sir. I give them a quick verbal briefing of the
 3 situation that had happened in the City Room.
 4 Q. Did you explain that you had done your raw check?
 5 A. Yes, sir.
 6 Q. And did you then, no doubt together with the OFC, ensure
 7 that firearms officers were placed in appropriate
 8 locations within the room in order to ensure the safety
 9 to the extent you could of those who were in there?
 10 A. Yes, because at that time, I treated these as like --
 11 what I describe as a bulkhead. I was happy from the
 12 Victoria entrance through to the City Room was clear and
 13 it was only from then onwards into the arena, et cetera,
 14 that I wasn't happy, it hadn't been cleared at that
 15 point in time so they were positioned to -- deemed to
 16 where the threat might come from.
 17 SIR JOHN SAUNDERS: Were they sent to search around there as
 18 well?
 19 A. An immediate search of their immediate area?
 20 SIR JOHN SAUNDERS: Going into the arena bowl.
 21 A. I do then task that, sir, and we go into --
 22 SIR JOHN SAUNDERS: We're coming to that? Just help me
 23 while we've stopped. A raw search, a raw check, is
 24 a term of art?
 25 A. Yes, sir. It's just something that I did with my

109

1 colleague. It was just a quick check --
 2 SIR JOHN SAUNDERS: I know, but has it got a definite
 3 meaning within the firearms --
 4 A. No.
 5 SIR JOHN SAUNDERS: It's what you personally call it?
 6 A. Yes, sir.
 7 SIR JOHN SAUNDERS: When the other officers came,
 8 I understand they are there to make sure no gunman can
 9 come into the City Room --
 10 A. Yes, sir.
 11 SIR JOHN SAUNDERS: -- and protect people who are there.
 12 A. Yes, sir.
 13 SIR JOHN SAUNDERS: But is there any further search or more
 14 detailed search done of the City Room when other
 15 officers come?
 16 A. On my handover to PC Richardson, sir, I inform him of
 17 what I've done, as in I've done a quick raw check of the
 18 room, it will need a secondary search, of which then
 19 people are tasked to go in, but that is then taken over
 20 from me and given to PC Richardson.
 21 SIR JOHN SAUNDERS: Thank you.
 22 MR GREANEY: Having given that briefing did you then have
 23 a discussion with PC Richardson about what your
 24 respective roles should be at the scene?
 25 A. Yes, sir.

110

1 Q. Was a decision made that PC Richardson remain within the
 2 City Room and have command and control?
 3 A. It was, yes.
 4 Q. And that you would coordinate the search of the arena?
 5 A. It was, sir, because I knew -- I know in an
 6 Operation Plato, especially in an incident like that,
 7 the amount of pressure that the OFC would be under and
 8 the FDO and other people that if I could relieve him of
 9 some of that pressure so he could concentrate on that
 10 City Room and the communications with the TFC,
 11 et cetera, and the FDO, I could then command the other
 12 troops to go forward to try and fulfil our task of
 13 identify, locate, confront and neutralise that threat,
 14 knowing that there is further people inside the bowl
 15 in the arena itself.
 16 Q. In the schedule we see many messages that you pass over
 17 a period of time to the FDO indicating to him about how
 18 the search is progressing.
 19 A. Sir.
 20 MR GREANEY: So perhaps after lunch we can look at a small
 21 number of those entries but I'd expect to conclude my
 22 questioning within no more than 10 minutes.
 23 SIR JOHN SAUNDERS: Thank you.
 24 Did you before this have any idea of the geography
 25 of the arena?

111

1 A. Yes, sir, I live in the locality as such and, yes,
 2 I have been to the arena a few times.
 3 SIR JOHN SAUNDERS: So you had some general knowledge of --
 4 A. Yes, sir.
 5 SIR JOHN SAUNDERS: -- the bowl and things like that?
 6 A. Yes, sir.
 7 SIR JOHN SAUNDERS: And the various exits?
 8 A. Yes, hence the reason I went to Victoria Station and
 9 others went -- I sort of knew in my head that the
 10 MEN Arena -- one of the front entrances, the main steps
 11 going up the front, is outside Victoria, so that's why
 12 I guided my driver to go there.
 13 SIR JOHN SAUNDERS: And that helped, having a knowledge of
 14 the geography of the building?
 15 A. Yes, sir, definitely.
 16 MR GREANEY: It's an early lunch, but it's a convenient way
 17 of dealing with it.
 18 SIR JOHN SAUNDERS: We're going to finish early anyway this
 19 afternoon, so we're going to break off until 1.30.
 20 (12.32 pm)
 21 (The lunch adjournment)
 22 (1.30 pm)
 23 MR GREANEY: Constable Moore, there are just three areas
 24 that I would like to seek your evidence upon, each of
 25 them is short, and then I'll have finished my questions:

112

1 first of all, the warm zone and medics; secondly, the
 2 search; and thirdly, Chief Inspector Dexter. Let's deal
 3 with those as efficiently as we can.
 4 Before lunch, you explained to me, and I'm going to
 5 quote from what you said:
 6 "My dynamic risk assessment [this is after you have
 7 done your raw check] of the area at that time was that
 8 it was a warm zone, being able to bring in the medics."
 9 A. Yes, sir.
 10 Q. You went on to indicate that you had communicated that
 11 view, namely that medics needed to come in in some way.
 12 Could you help us with in what way and to whom did you
 13 communicate your view that there needed to be assistance
 14 within the City Room?
 15 A. It was passed over the radio to the FDO so he was aware
 16 that I was requesting medics, et cetera, so I had
 17 shouted up on the radio itself of which the FDO monitors
 18 and then also when I handed over to PC Richardson.
 19 Q. Let's take this in stages and I'm not for a second
 20 suggesting that you're not seeking to give us an
 21 entirely accurate account of what happened.
 22 I have not been able to find in the audio that
 23 we have, and others have been in the same position,
 24 a message that you passed to that effect. If I've
 25 missed something, I'll be corrected.

113

1 A. There's definitely a transmission in the thing where
 2 I have asked further trauma care and medics, et cetera.
 3 Q. You have seen that, have you, during your preparation?
 4 A. Yes, sir. I definitely have, sir.
 5 Q. What I really don't want to put you on the spot because
 6 that's not fair, so unless you can find it immediately,
 7 I'll look again but I couldn't find it.
 8 We'll have a look in due course. What I might be
 9 able to help you with a bit more is Mr Richardson, so
 10 we'll track that. Please don't be destabilised by it in
 11 any way and it may be that someone else who asks you
 12 questions will be able to spot it, otherwise we'll find
 13 it or seek to do so in due course.
 14 SIR JOHN SAUNDERS: He looks like stable to me at the
 15 moment. You're all right, are you?
 16 A. Yes, sir.
 17 MR GREANEY: The second way in which you communicated your
 18 view that medics were needed was by speaking to the OFC,
 19 Mr Richardson; is that right?
 20 A. Yes, sir, in sort of a mini handover (overspeaking) --
 21 Q. So this is very shortly after he's arrived in the
 22 City Room and therefore shortly after you've concluded
 23 your raw check?
 24 A. Yes, sir.
 25 Q. What we do know, you don't have this on your schedule

114

1 but this won't be taking you by surprise -- sir, you do
 2 have it on your -- in a number of places, but in your
 3 Sexton schedule, you have it at page 4 and we looked at
 4 it again with Mr Richardson yesterday.
 5 I'll just tell you what this message says
 6 Constable Moore. For the record, it's entry 2735, timed
 7 at 22.53.28, so it's not long at all after you've given
 8 your briefing to Mr Richardson. It's Mr Richardson on
 9 the radio to the FDO:
 10 "FDO, OFC. Can I just give you an update from
 11 inside the MEN?"
 12 Mr Sexton says:
 13 "Go ahead, go ahead."
 14 Mr Richardson:
 15 "No change to the situation, we've got some staff
 16 coming in, they're assisting, any medical assistance
 17 they can do. Got mass casualties. It does look like
 18 it's been a nail bomb, there's bolts, there's shrapnel
 19 everywhere."
 20 He then identifies that the bomber is present, he
 21 says that he has seen his body:
 22 "Nothing to suggest anyone further but -- have you
 23 got any movements in relation to the explosives dog?"
 24 That question is then posed by Mr Sexton to someone
 25 else and it's established that the dog isn't imminent.

115

1 Then this, this is the part I wanted to draw your
 2 attention to. Mr Richardson says this:
 3 "And I appreciate also the -- we just need more ambo
 4 staff, paramedics, anyone that we can get hold of,
 5 please."
 6 And he's reassured by Mr Sexton that that is in
 7 hand. So it would seem that what Mr Richardson was
 8 passing as a message at that stage may well have been
 9 his own view in any event, but was very much the sense
 10 that you had been communicating to him in your handover?
 11 A. Yes, sir.
 12 Q. The second topic, sir, unless you wanted to ask any
 13 questions about that?
 14 SIR JOHN SAUNDERS: No, thank you.
 15 MR GREANEY: The second topic is your search. We don't need
 16 to go into this in any detail. But did you then
 17 supervise the carrying-out of a search of the entire
 18 premises?
 19 A. I did, sir, yes.
 20 Q. And provide updates to the FDO over the radio about the
 21 progress of that search?
 22 A. Yes.
 23 Q. Would it be fair to say that the search was not
 24 a straightforward one to carry out?
 25 A. No, sir, because of the complexities and the size of the

116

1 arena itself .
 2 Q. I think not just the size but also the fact that there
 3 were a number of anterooms in the place?
 4 A. Yes.
 5 Q. Some of which were locked?
 6 A. Yes, sir .
 7 Q. We know that Mr Richardson was, as you have just seen in
 8 one example, calling for an explosives dog at an early
 9 stage. Would you agree that an explosives dog was
 10 something that was going to be of assistance in carrying
 11 out the search?
 12 A. Yes, definitely .
 13 Q. In simple terms, bearing in mind your experience, why
 14 would that be?
 15 A. Just simply because obviously the incident itself was an
 16 explosive device and historically if you look at other
 17 terrorist incidents, there's a good possibility that
 18 there would be secondary devices, et cetera, so to clear
 19 somewhere, it'd be very hard for us as AFOs to do that.
 20 We are not skilled in obviously opening bags, et cetera,
 21 that's something we wouldn't do. So you wouldn't touch
 22 something that you think possibly would be a secondary
 23 device, whereas an explosive dog it's trained to be able
 24 to sniff and then be able to indicate whether they think
 25 that that might contain explosives.

117

1 Q. So quite invaluable in the situation (overspeaking) --
 2 A. Yes, definitely .
 3 Q. Taking an example, we have the rucksack which is on the
 4 arena side of the concourse, the day sack. And you were
 5 not going to open it to see if there was a device
 6 inside?
 7 A. No, sir .
 8 Q. Did that need to remain until either it was checked by
 9 an expert from EOD?
 10 A. Yes.
 11 Q. Or it was the subject of a sniff by a dog?
 12 A. It was, sir , which is obviously what happened in the
 13 end.
 14 Q. The sense when one looks at Mr Richardson's
 15 communications over a period of time, and indeed he was
 16 to confirm this yesterday, is that he was frustrated
 17 at the period that it took for an explosives dog to
 18 arrive because it wasn't until 23.43 when a dog arrived
 19 at the scene and even then it wasn't a GMP dog, it was
 20 a BTP dog. Did you, as the person responsible for the
 21 search, feel that frustration alongside him?
 22 A. I did to an extent, sir , but to be honest I was that
 23 busy trying to conduct the search itself physically
 24 that, yes, a dog would have assisted me and I could zone
 25 certain areas off in my mind that needed to be checked

118

1 at a later date, but it didn't cross my mind until the
 2 very end when I could then run the dog through. But
 3 initially it would be a physical check by AFOs.
 4 Q. In the end, when you were able to run a dog through, it
 5 starts at about 23.47, did it strike you that the dog
 6 had been a long time in coming?
 7 A. Having spoke to the dog handler as well, sir , the dog
 8 was tired, it had been on duty for that amount of time,
 9 so the actual use of it was pretty negligible in the
 10 end.
 11 Q. Are you talking about the BTP dog?
 12 A. Yes, I am.
 13 Q. I said that we wouldn't look at every entry relating to
 14 the search. As I've indicated, there are a number of
 15 them and it's quite clear that you were providing
 16 regular updates about what was going on. But I just
 17 want to look at two particular entries in the audio
 18 schedule that you are involved in. One of them deals
 19 with something that we rather passed over with
 20 Mr Sexton. The first is entry 4051, which is page 2 of
 21 the schedule.
 22 This is an entry timed at 23.03.45. It's clear from
 23 this that the search is well underway by now. Mr Sexton
 24 states:
 25 "Force Duty Officer Sexton."

119

1 And you are recorded as having said:
 2 "Yeah, received. All the centre section of the main
 3 arena has been cleared by the AFOs."
 4 So is this an example of what you were doing over
 5 time, clearing a particular area and then notifying the
 6 FDO of what you had done?
 7 A. Yes.
 8 Q. Then this, which I ought to draw attention to in the
 9 context of some questions Mr Sexton was asked, so you
 10 might want to bear this in mind. Mr Sexton is then on
 11 a call to Derbyshire Police, I think it's the Derbyshire
 12 FIM, and she's offering their armed assets or some of
 13 them and Mr Sexton is recorded as saying:
 14 "Yeah. We've got a major incident, it's been
 15 confirmed it's a terrorist attack."
 16 And he then indicates other resources that he's
 17 using and I'm identifying that not for your benefit but
 18 for the chairman's benefit because we do in fact there
 19 have a reference to a major incident that we didn't look
 20 at with Mr Sexton.
 21 Just one final entry I'll ask you about, it's the
 22 bottom one on that page. By now it's 23.16. To be
 23 precise, this message starts at 23.16.41. A number of
 24 officers are involved in it. And this is the point in
 25 time at which a concern begins to develop about whether

120

1 there has been a second male involved with the bomber.
 2 A. Sir.
 3 Q. I'm sure you'll recall what I had in mind. At the very
 4 bottom of that entry you're recorded saying three lines
 5 up from the bottom:
 6 "Lee to Eddie. Can you make sure the FDO and
 7 everybody knows we referenced that black rucksack, mate?
 8 That could obviously be a secondary."
 9 Do you see that?
 10 A. Yes, sir.
 11 Q. Tell me if I've understood correctly what's happening
 12 there. There is a concern that another person might be
 13 involved in this?
 14 A. Sir.
 15 Q. And that he therefore might be a source of harm?
 16 A. Yes, sir.
 17 Q. You've got this black rucksack on the arena side of the
 18 concourse, which may or may not be a secondary device,
 19 and you're making sure that everyone has in mind that
 20 that bag exists and it could be a secondary?
 21 A. Yes, sir.
 22 Q. That's what you're saying at that stage?
 23 SIR JOHN SAUNDERS: Before you leave that, just to reassure
 24 you, I think that we did actually deal with Mr Sexton
 25 with the conversation with the Derbyshire officer

121

1 because I seem to remember it being said they had enough
 2 vehicles --
 3 MR GREANEY: Exactly. You've remembered the discussion
 4 precisely, sir. So if I --
 5 SIR JOHN SAUNDERS: That's all right.
 6 MR GREANEY: -- I misremembered, I did myself down, which
 7 isn't like me.
 8 The final topic I want to deal with is very short
 9 indeed. We know that at 23.23 Chief Inspector Dexter
 10 arrives at the scene and you were involved in briefing
 11 him at 23.29; do you recall that?
 12 A. Yes, sir.
 13 Q. The entry for the record is 6846. What did you
 14 understand was the role that Chief Inspector Dexter was
 15 arriving to perform?
 16 A. The ground--assigned TFC, sir.
 17 Q. In that role what did you expect his responsibilities
 18 would include?
 19 A. To have taken command of the situation and the incident
 20 in the whole context of what it was and then to report
 21 back to the SFC and to deal with it from there.
 22 Q. Did you anticipate that he would have responsibility
 23 only for the armed assets at the scene or for both armed
 24 officers and unarmed officers once he arrived?
 25 A. Armed officers, sir, because of the TFC.

122

1 Q. I will ask you about one final issue, which is different
 2 but connected. We know that the OFC, Mr Richardson,
 3 remained at the scene.
 4 A. Yes.
 5 Q. And he did not go to an RVP or an FCP, not that there
 6 ever was an FCP.
 7 A. Yes, sir.
 8 Q. As of May 2017, would it have been your expectation
 9 in that situation that you were dealing with that the
 10 OFC would have stayed at the scene or gone to the FCP or
 11 might he have done either?
 12 A. I think it would be either, sir. I think it would be
 13 again another dynamic risk assessment, looking at
 14 staffing levels and ARVs that are in attendance at that
 15 point in time. Yes, if he could have been spared then,
 16 yes, he should have co-located with the FCP, I would
 17 say, and to have dealt with other agencies at the FCP.
 18 But dependent on the situation and staffing, as I say,
 19 with ARVs and the ongoing situation, then it could go
 20 the other way as well, I'd say.
 21 SIR JOHN SAUNDERS: So we've heard of other situations where
 22 a commander may not be able to go to an FCP himself --
 23 A. Yes, sir.
 24 SIR JOHN SAUNDERS: -- and he will then send somebody else
 25 instead? Is that a possibility?

123

1 A. If you've got the staff you could send someone to liaise
 2 so they've got a communications link on the ground
 3 at the -- you know, at the FCP. Obviously when you're
 4 looking at the JDM joint decision model, that officer
 5 would be struggling at that point because of whatever
 6 command level they're at. But as a communications link,
 7 then I would say as an OFC you could do that.
 8 SIR JOHN SAUNDERS: Thank you.
 9 MR GREANEY: Thank you very much. Constable Moore,
 10 thank you very much indeed for answering my questions.
 11 SIR JOHN SAUNDERS: I'm going to ask two before we hand it
 12 over, if that's all right.
 13 MR GREANEY: Yes, of course.
 14 SIR JOHN SAUNDERS: You describe the difficulties in your
 15 search and you can think about this if you like and tell
 16 me. Obviously you can go into public buildings, places
 17 where the public go into, where you may be in a similar
 18 situation?
 19 A. Yes, sir.
 20 SIR JOHN SAUNDERS: If I'm thinking of recommendations, is
 21 there anything that people who operate public buildings
 22 like this could do to help you make the search easier?
 23 A. I don't know if I can respond publicly, sir.
 24 SIR JOHN SAUNDERS: Okay, don't then. I'll ask that if GMP
 25 can speak to you and can just forward to me any ideas

124

1 that you do have? Thank you. That's one thing.
 2 The second is this: when you're deciding on what you
 3 think the zoning should be, which is obviously very
 4 important to do, do you get any training on that? It's
 5 quite a difficult risk assessment job to carry out,
 6 isn't it.
 7 A. It is, and a lot of that comes down to experience. We
 8 do run through the process itself when we do carry out
 9 them exercises. However, into the levels of conducting
 10 that risk assessment then, no, it's down to -- it'll be
 11 down to individual perception and individual threat
 12 perception, et cetera, at that time.
 13 SIR JOHN SAUNDERS: And situations can vary?
 14 A. Yes, sir.
 15 SIR JOHN SAUNDERS: You could have an empty zone where
 16 you're looking at, no one there. You could have
 17 somewhere, very unhappily, where everyone's deceased or
 18 anyone who is in there. And you could get a situation
 19 where you have casualties who need treating as well.
 20 Are you trained how to deal with those situations
 21 differently?
 22 A. Not particularly, sir, no. Again, most of firearms,
 23 when it comes down to threat perception, is down to the
 24 individual's threat perception. We do do training on
 25 judgemental exercises, et cetera, but it is everybody's

1 individual threat perception so then when you become an
 2 OFC that goes with you and that's how you look at it and
 3 have to assess that.
 4 SIR JOHN SAUNDERS: I appreciate it's all down to individual
 5 perception at the end, but hopefully trained individual
 6 perceptions and guidance which has been given before it.
 7 A. We do get guidance and we do get training, as I say,
 8 in relation to judgemental training, et cetera, and then
 9 we will be given some guidance but that's exactly what
 10 it is, is guidance, because...
 11 SIR JOHN SAUNDERS: Thank you.
 12 MR GREANEY: I will just deal with one thing before I invite
 13 Mr Smith to ask any questions that he has.
 14 Constable Moore, you're quite right that you did
 15 pass a message about trauma. It's not on the audio
 16 schedule. These are quite brilliant documents, for
 17 which we're grateful, but they are not infallible.
 18 At 22.46.15, there is the following exchange -- it's
 19 a little confused because there are two conversations
 20 over the radio happening at the same time, which I'm
 21 certain does occur from time to time. Is that correct?
 22 A. Yes.
 23 Q. So you are recorded, this is on the firearms Talk Group,
 24 which we won't give the number to, saying:
 25 "Trauma kit, et cetera."

1 And Mr Sexton says:
 2 "To the Victoria entrance, to the arena?"
 3 You then say:
 4 "That's correct, boss. We're talking upwards of 30
 5 or 40 casualties."
 6 So it's absolutely clear you're in the City Room by
 7 now. Mr Depono indicates that he is just ready to go
 8 inside --
 9 A. Yes, sir.
 10 Q. -- the City Room. You say again:
 11 "Can we have all available trauma kit to the top of
 12 Victoria Station?"
 13 Mr Depono interjects again and the FDO then invites
 14 you to go ahead you and say:
 15 "Boss, including these casualties we've still
 16 got..."
 17 And you indicate that you think there are a number
 18 of people inside the arena.
 19 Mr Sexton says:
 20 "Yeah, we're satisfied at this moment in time that
 21 there's been no further explosions since the initial
 22 report."
 23 So is that the radio message that you had --
 24 A. Yes, sir.
 25 MR GREANEY: -- in mind? So 22.46.15. We've now got that

1 squarely in mind. Thank you very much indeed.
 2 I'm very grateful to the solicitor to the inquiry
 3 for locating that for me.
 4 I am now going to ask Mr Smith to pose any questions
 5 that he has, please.
 6 MR SMITH: Thank you, sir, we have no questions.
 7 MR GREANEY: I'm going then to invite Mr Weatherby to ask
 8 his questions on behalf of the families.
 9 Questions from MR WEATHERBY
 10 MR WEATHERBY: Mr Moore, can you see and hear me?
 11 A. I can, yes, sir.
 12 Q. Good. I've only got a very few questions indeed for
 13 you. Can I start by acknowledging the difficult and
 14 dangerous role that you had and indicate to you that the
 15 families recognise that and they thank you for going,
 16 without regard for your own safety, into the scene and
 17 doing whatever you could to assist the casualties, so
 18 thank you for that. Okay?
 19 A. Sir.
 20 Q. Can I deal with a point about statements and timings,
 21 and again can I preamble it by saying that I am not
 22 making any criticism of you, nor suggesting anything
 23 sinister, but the chair has raised it with you and
 24 I just want to go slightly further just in terms of
 25 process. So I'm just asking you for a little bit of

1 help here.
 2 According to the disclosure that we've had, you
 3 filled in what is termed a debrief questionnaire.
 4 A. Yes, sir .
 5 Q. And I think that's the first record that you made. That
 6 was on 17 January 2018.
 7 A. Yes, sir .
 8 Q. There is simply one sentence on the questionnaire, where
 9 you assert that:
 10 "I was the first firearms officer on scene."
 11 And confirmed that it was an explosion, mass
 12 casualties, and to initiate Operation Plato:
 13 "I then conducted a search and secure of the arena."
 14 A. Yes, sir .
 15 Q. So that is essentially a two—liner, just informing
 16 anybody who reads the questionnaire that that was your
 17 role. So presumably, its purpose is so they can come
 18 back to you; is that right?
 19 A. Yes, sir, that's correct.
 20 Q. So up to that point, as I understand it, you hadn't made
 21 any record of what happened that night?
 22 A. No, sir .
 23 Q. Okay. Then on 12 July 2018, you then made quite
 24 a detailed handwritten note over quite a lot of pages.
 25 A. No, they are, they're not my notes, they're taken by —

1 is this in relation to my statement?
 2 Q. Well, it's obviously something I've misunderstood, I am
 3 not doing very well today, but it's termed "Handwritten
 4 statement notes of PC Lee Moore" (overspeaking).
 5 A. Yes. They're my paper notes, sir, but not written by
 6 myself. An officer attended or a civilian attended to
 7 take the statement from me and they're his notes of our
 8 conversation in relation to my recall.
 9 Q. I see. So a police civilian statement—taker came and
 10 took those notes from you?
 11 A. Yes, they did, yes.
 12 Q. Then finally, you then produced a statement that's been
 13 referred to on 13 February 2019?
 14 A. That's correct, sir .
 15 Q. So the first time that you gave any kind of detailed
 16 account was something like 14 months after the event?
 17 A. That's correct, sir .
 18 Q. You referred briefly earlier to PIP, that's the
 19 post—incident procedure?
 20 A. Yes, sir .
 21 Q. I think you're referring to the PIP for armed
 22 operations; is that right?
 23 A. That's correct, sir .
 24 Q. I don't have that in front of me and I don't suspect you
 25 do, but I'll deal with it very briefly and if we need

1 to, we can look at it with someone else. Am I right
 2 that the post—incident procedure for firearms operations
 3 indicates that those involved, unless they've had an
 4 actual role, for example, someone who's fired a shot,
 5 others involved in the incident are discouraged from
 6 making any account, any note, for — I think it's
 7 48 hours; is that right?
 8 A. We're not discouraged, sir. That PIP process, unless
 9 you are the principal officer, which would be marked as
 10 the principal officer — I believe it's principal
 11 witness now.
 12 Q. Yes.
 13 A. Then yes, until you've received legal advice in relation
 14 to your incident, then you are encouraged to produce
 15 what we call a duty statement, sir, to confirm that you
 16 were there on the night or on the occasion of that
 17 incident and then it also allows you to have a recall of
 18 up to 48 hours afterwards.
 19 Q. I think the principle under that is it's recognised or
 20 it's thought that people are able to put their
 21 recollections better after a short period to collect
 22 their thoughts. Is that a fair way of putting it?
 23 A. Yes, sir .
 24 Q. Is the reason why there's no account of any detail from
 25 you for 14 months simply that nobody asked you for it?

1 A. Yes, sir .
 2 Q. Again, we're looking at a variety of things in this
 3 inquiry and one of them will be recommendations. Might
 4 it be sensible for people involved in serious incidents
 5 to actually do a detailed pocket notebook or a similar
 6 sort of note much sooner than 14 months?
 7 A. Yes, I'd agree to that, sir. But there's a point that
 8 straight after the incident, for the next 16 days,
 9 we were working 14 to 16—hour shifts a day, obviously
 10 within the Manchester Arena — within the Manchester
 11 area itself as protection, et cetera. So yes, I agree,
 12 but at that point in time for them 2 or 3 weeks,
 13 we would have found it very difficult to be able to sit
 14 down and to do that, sir. But no, I do agree with the
 15 point you make.
 16 Q. Can I just stress, I'm not being critical of you. I was
 17 just dealing with those questions as a matter of
 18 process.
 19 Just a few further questions about the night that
 20 we're looking at. As Mr Greaney has already taken you
 21 through, you advised the FDO, Mr Sexton, that this was
 22 what you thought was an Operation Plato event at about
 23 22.43.
 24 A. Yes.
 25 Q. Did you do so because you were wanting to convey the

1 seriousness of the situation , that it was a real event,
 2 not a hoax or false alarm? And also — sorry, you go
 3 on.
 4 A. Twofold, really , sir . Firstly , for speed, because when
 5 you look at Operation Plato within a context of what the
 6 operation is, when you start bringing in tri –services,
 7 et cetera, you’ve got HART teams, the Fire Brigade, that
 8 have all got specialist teams that take time to get
 9 together, and on an MTFA you haven’t got time, every
 10 second counts, which is why — the reason myself and my
 11 colleague ran in with no extra PPE on is because it is
 12 all down to time and seconds.
 13 And secondly, as you say, to give the FDO the
 14 seriousness of the offence and the incident that was
 15 happening in as short a time frame as possible because,
 16 as you’ve undoubtedly heard, some of the radio
 17 communications, it’s very hard to get on. We have one
 18 radio, one communications channel and a firearms channel
 19 and everybody is trying to pass information, all
 20 correctly and rightly so, but it’s very hard to get that
 21 information across to one person.
 22 Q. That’s very helpful , thank you.
 23 In any major incident of this type, where it arises
 24 spontaneously so far as you’re concerned, confusion
 25 at the start is a default position, isn’t it? It’s very

1 rare that you have a clear position?
 2 A. It is , sir , yes. We are given a clear position on our
 3 authority, so our authority was an emergency search, so
 4 myself and my colleagues were clear what was being asked
 5 of us to do. But in relation to the intelligence and
 6 information coming in from everywhere, then yeah, it’s
 7 so confusing.
 8 Q. From the police firearms side, conveying in those two
 9 words "Operation Plato", you were telling the FDO, "This
 10 is serious, this is real". You then anticipated my next
 11 question, which is that you understood straightaway with
 12 the reports of mass casualties that the multi–agency
 13 Plato response had to be triggered at the earliest
 14 possible point? Is that right , was that your mindset?
 15 A. It is , sir , yes, because as I say, it takes time, it’s
 16 a big machine with a lot of commanders and a lot of
 17 leadership to get going, and every second counts, so the
 18 sooner we can get them informed, the quicker that they
 19 can come in and start doing what we want them to do.
 20 Q. Yes. So from the firearms side, every second counts
 21 because if you do have an active shooter then they have
 22 to be dealt with immediately and on the other side of
 23 it , the relief response, every second counts because the
 24 injuries are obviously likely to be very serious and
 25 life –threatening?

1 A. Exactly. That’s why I want as many ambulance and Fire
 2 Brigade and support elements that we can have coming up
 3 behind me and following behind me. Once we have made
 4 them areas safe and clear, that’s what I want, to get
 5 them into that area to deal with whatever we’ve
 6 progressed through.
 7 Q. That’s very helpful . Thank you.
 8 Can I just move on to a point of detail. You’ve
 9 told us that you and your colleague were first into the
 10 City Room, you did this raw search, a sweep of the
 11 City Room as best as you could. That satisfied you so
 12 far as you could be satisfied there was no active
 13 shooter?
 14 A. Sir .
 15 Q. It also satisfied you that there was no obvious
 16 secondary device, although of course you couldn’t rule
 17 that out?
 18 A. No, sir .
 19 SIR JOHN SAUNDERS: It’s quite an important question and it
 20 was two questions in one. First of all , do you agree
 21 there was no obvious secondary device?
 22 A. There was no obvious secondary device, sir, not that
 23 I could see.
 24 SIR JOHN SAUNDERS: You couldn’t be certain was the second
 25 part of the question.

1 A. Yes, sir .
 2 SIR JOHN SAUNDERS: I just wanted to be sure what was being
 3 said yes to, Mr Weatherby.
 4 MR WEATHERBY: Sorry, my poor question.
 5 The point I was coming to with that as the context
 6 is that shortly after that, having gone out on to the
 7 concourse, you have told us about the rucksack that you
 8 were concerned about. You in fact moved two casualties,
 9 who each had leg injuries, back from the concourse into
 10 the City Room, I think.
 11 A. Yes, sir .
 12 Q. Is that right?
 13 A. Yes, sir .
 14 Q. And you were telling us earlier that, having done your
 15 initial sweep of the City Room, you’d formed the
 16 conclusions we have just gone through, but obviously
 17 there hadn’t been a search or a sweep of the wider arena
 18 area, and of course you had this concern over the
 19 rucksack.
 20 The safer place for these two casualties at that
 21 point in your mind was actually to bring them back into
 22 the City Room; is that right?
 23 A. Having dynamically risk assessed it , yes, I deemed that
 24 being out on the concourse in line of sight of that bag,
 25 which could be a secondary device, was more — was

1 a greater harm to them two people than putting them into
 2 the room where I've had a raw search initially .
 3 Q. Yes, indeed. And of course, beyond the issue of the
 4 rucksack, you didn't know what was beyond that in terms
 5 of a threat because it hadn't been swept or searched?
 6 A. No, sir, no.
 7 Q. In the City Room, you then spoke to Mr Richardson and
 8 then the City Room itself was secured by armed officers
 9 covering the doors; is that right?
 10 A. Yes, sir .
 11 Q. The purpose of doing that was, of course, to restrict
 12 access, in particular to any continuing threat, but to
 13 set up as safe a scene as possible for emergency
 14 responders to come in and treat and evacuate casualties;
 15 is that right?
 16 A. That's correct, sir, yes.
 17 MR WEATHERBY: Mr Moore, thank you very much. Those are my
 18 questions?
 19 SIR JOHN SAUNDERS: This has already been made clear by
 20 Mr Weatherby and I think it's quite important, so let me
 21 just emphasise it: you were saying Plato --
 22 A. Yes, sir .
 23 SIR JOHN SAUNDERS: -- because you wanted the best
 24 opportunity of getting HART teams and other specialist
 25 teams who could go into warm zones there as soon as

137

1 possible?
 2 A. Yes, sir . I know it takes time to pre-empt. To be
 3 honest, I didn't care who it was, I didn't care, any
 4 medics, anybody else, just to get them in, but I know
 5 that on an Operation Plato the HART teams are warned and
 6 the specialist Fire Brigade are warned at that time.
 7 SIR JOHN SAUNDERS: And if it's a warm zone, only they can
 8 go into it --
 9 A. Yes.
 10 SIR JOHN SAUNDERS: -- as I understand it from what I have
 11 heard?
 12 A. They are trained to go into that warm zone and take it
 13 on from there.
 14 SIR JOHN SAUNDERS: That's your purpose: let's get as many
 15 people there as soon as possible, let 's declare Plato
 16 quickly, after all, we can always change our minds
 17 later?
 18 A. It can always be rescinded. Plato isn't definitive . It
 19 isn't, "That's it, we've called Plato, we've got to go
 20 with that". It can be withdrawn at a later stage if
 21 needs be, downgraded -- not downgraded but changed to
 22 a major incident or ...
 23 SIR JOHN SAUNDERS: Then you rush upstairs absolutely as
 24 quick as you can?
 25 A. Yes, sir .

138

1 SIR JOHN SAUNDERS: And within a minute of getting in that
 2 room you're saying: on my dynamic risk assessment, this
 3 is a warm zone --
 4 A. Yes, sir .
 5 SIR JOHN SAUNDERS: -- there is no obvious shooter there and
 6 we can secure the doors?
 7 A. Yes, sir .
 8 SIR JOHN SAUNDERS: Okay.
 9 MR GREANEY: So finally, Mr Horwell --
 10 SIR JOHN SAUNDERS: Thank you. I'm really grateful. I said
 11 it to Mr Richardson, and I said it generically to all
 12 firearms officers , really , that we are aware of the
 13 courage that firearms officers have to show to go into
 14 a room, as you did, where a bomb had exploded, where
 15 there may have been another suicide bomber in the room
 16 or you could have faced a gunman who had no fear of
 17 being killed himself, because that's what he wanted, and
 18 would be much more dangerous because of that. We've
 19 already just heard, and I am afraid that I was not
 20 really conscious of it, that you actually rushed in
 21 without putting on additional PPE, which no doubt you
 22 were meant to do.
 23 A. Yes, sir .
 24 SIR JOHN SAUNDERS: But in order to get in to do what you
 25 could to help people in there, you went in without that

139

1 extra protection. It seems to me to have been an
 2 incredibly brave thing to do.
 3 MR GREANEY: Thank you very much indeed.
 4 The further call that we identified at a late stage
 5 dealing with trauma kit, I can give you the reference to
 6 it because it is in the master sequence of events.
 7 SIR JOHN SAUNDERS: Thank you.
 8 MR GREANEY: It is reference number 2091, timed, as
 9 I indicated, at 22.46.15. The reason why nobody spotted
 10 it until Ms Taylor is because that which was said by
 11 Mr Moore was wrongly attributed in the schedule to his
 12 colleague, Mr Simkin.
 13 SIR JOHN SAUNDERS: Right. But you obviously realised it
 14 was you?
 15 A. I had a problem, sir, with my radio, so I've had to
 16 activate my colleague's, Mr Simkin's, radio off him. So
 17 initially when we've looked at other transcripts, all my
 18 transmissions have come up under Mr Simkin's collar
 19 number.
 20 SIR JOHN SAUNDERS: You could have saved Mr Greaney a lot of
 21 trouble had you told him that!
 22 A. I'm sorry about that, sir .
 23 MR GREANEY: The next witness will be Inspector Michael
 24 Smith, the Bronze commander on the night. We just need
 25 a very short break, sir , so that Mr Moore can leave and

140

1 the next witness comes in.
 2 SIR JOHN SAUNDERS: What is a very short break?
 3 MR GREANEY: I would have thought 5 minutes will do it, sir.
 4 (2.12 pm)
 5 (A short break)
 6 (2.20 pm)
 7 MR DE LA POER: Sir, may the witness please be sworn.
 8 INSPECTOR MICHAEL SMITH (affirmed)
 9 Questions from MR DE LA POER
 10 MR DE LA POER: Please could you give us your full name?
 11 A. It 's Michael Smith.
 12 Q. And your rank?
 13 A. Inspector.
 14 Q. Inspector Smith, so that everybody who may not already
 15 know this knows it from the outset, you were the GMP
 16 Bronze commander, weren't you, for the Manchester Arena
 17 attack?
 18 A. Yes.
 19 Q. We will begin by looking at your background and
 20 training. Did you join Greater Manchester Police in
 21 1992?
 22 A. I did.
 23 Q. So you now have approximately 29 years of service?
 24 A. Yes.
 25 Q. About 4.5 years after you joined, did you undertake

141

1 training as a detective constable?
 2 A. Yes.
 3 Q. By 1998, had you achieved the rank of sergeant?
 4 A. Yes.
 5 Q. The following year, did you undertake a firearms
 6 training course?
 7 A. I did.
 8 Q. But did you not pursue that as a career?
 9 A. No.
 10 Q. So for the period 1999 to 2003, were you a detective
 11 sergeant but not in any armed capacity?
 12 A. No, I was a detective sergeant for about 6 months of
 13 that period and the rest of the time I was a response
 14 and custody sergeant at Longsight Police Station.
 15 Q. In 2003 did you join the Tactical Aid Unit?
 16 A. I did.
 17 Q. The following year, did you qualify as a police search
 18 adviser?
 19 A. Yes.
 20 Q. And in 2008 were you promoted to the rank that you now
 21 hold, namely that of an inspector?
 22 A. I was, yes.
 23 Q. In 2012, did you qualify as a public order
 24 Bronze commander?
 25 A. Yes.

142

1 Q. I think you did your initial course about 2 years after?
 2 A. I did. There's a period then to be assessed and in 2012
 3 that's when I was accredited.
 4 Q. Had you maintained that accreditation from 2012 until
 5 May 2017?
 6 A. Yes.
 7 Q. Would it be fair to describe you as an experienced
 8 Bronze commander as at May 2017?
 9 A. Yes.
 10 Q. Had you had the opportunity to act as a Bronze commander
 11 in relation to spontaneous incidents before May 2017?
 12 A. Yes.
 13 Q. Can you give us, please, a flavour of perhaps one or two
 14 of the most serious or challenging of those roles before
 15 May 2017?
 16 A. Certainly in the Bronze commander role, it is more
 17 geared to public order and public safety, so I suppose
 18 in terms of spontaneous, the role of the public safety
 19 Bronze commander is more like demonstrations that might
 20 have occurred at short notice. But in terms of my
 21 day-to-day role as a response inspector, I would be the
 22 inspector in charge, effectively the Bronze commander at
 23 a number of different incidents, serious incidents.
 24 Q. Again, can you give us any examples?
 25 A. It probably would include murders, serious radio traffic

143

1 collisions, suicides, fatal tram collisions. They are
 2 probably at the more serious end of things that I've
 3 dealt with.
 4 Q. Could I just ask you to keep your voice up a little bit?
 5 You might want to move a little more towards the
 6 microphones. Thank you very much indeed.
 7 Had you had to act as a Bronze commander at an event
 8 which bore any real similarity to the situation that you
 9 were confronted with in May 2017?
 10 A. No, nothing on that scale.
 11 Q. Given the training and experience that you'd had up
 12 until May 2017, do you think that you were adequately
 13 prepared to take that role?
 14 A. I would say yes. In terms of had I been involved in
 15 a terrorist-related training exercise, no, I hadn't.
 16 But certainly I had a broad range of experience by then.
 17 I was used to being the person in charge of the policing
 18 response to serious incidents, so in that sense yes.
 19 Q. I think we'll come in the course of your evidence to
 20 various observations you have made about what might have
 21 gone better and you will no doubt share with us at that
 22 point how you interacted with that observation. But
 23 let's just move away from Bronze commander for the time
 24 being and consider briefly first aid training.
 25 Do you think that the level of first aid training

144

1 that you had been provided with, before May 2017, was
 2 adequate? Can I just pause here to acknowledge that, as
 3 I understand it, you didn't in fact, because of the
 4 nature of your role, administer first aid yourself, but
 5 you were in a position to assess what might be required?
 6 A. Yes. I think the first aid training that we had up to
 7 that point --- I think was every 3 years that you are
 8 meant to have refresher training --- was really basic
 9 first aid, it was nothing like trauma training. I have
 10 more recently been on my refresher last year and that
 11 included a lot more in terms of stopping catastrophic
 12 bleeding and so on as a first priority. Up to that
 13 point, my recollection of first aid training was more ---
 14 SIR JOHN SAUNDERS: So it has changed?
 15 A. It has, yes.
 16 SIR JOHN SAUNDERS: As a result of this incident or do you
 17 not know?
 18 A. I suspect so. Perhaps when Mr Pilling comes to give
 19 that evidence ---
 20 SIR JOHN SAUNDERS: Thank you.
 21 MR DE LA POER: So in your 25 years of service in the police
 22 up until this incident, you hadn't received trauma
 23 training but you have since?
 24 A. Yes.
 25 Q. If we can be specific about one form of trauma response,

145

1 had you before the incident received any training in the
 2 application of a tourniquet?
 3 A. No. Just on your last response there, I'd say it's not
 4 trauma training as such, it's still classified as
 5 first aid training, but I think I recognise now that
 6 there is more of an emphasis on how important it is to
 7 deal with catastrophic bleeding and perhaps prior to
 8 that it was more about the ABC/CPR side of things.
 9 Q. Next we are going to consider some of the pages of the
 10 major incident plan. The first question in relation to
 11 that topic is this: by 22 May 2017, was that a document
 12 that you had ever read?
 13 A. Never read, no. I would say I had familiarity with the
 14 concepts of it, but I think the document itself is one
 15 that I have had a look through since. It's 250-plus
 16 pages, so certainly I have never read it. It's
 17 certainly touched on in various courses that I have done
 18 over the years.
 19 Q. That was going to be my next question. Although you
 20 hadn't read it, you had some familiarity, as you
 21 describe it, with it. How had you gained that
 22 familiarity?
 23 A. I would say it was probably touched on in the initial
 24 Bronze commander's course. I have done, before getting
 25 promoted to inspector, a course then and I think there

146

1 was an element of the training there to introduce it.
 2 But certainly in no great detail.
 3 Q. One of the matters, as we shall see, which is included
 4 in the major incident plan is reference to JESIP.
 5 A. Yes.
 6 Q. Had you received any JESIP training?
 7 A. I had in 2014. I think that's when JESIP was first
 8 introduced, certainly in GMP. I did a day joint
 9 training then that was held at our force training
 10 school, but it did involve the other emergency services.
 11 Q. Was that training delivered to you in the capacity of
 12 a Bronze commander or was that training intended across
 13 the board?
 14 A. I think it was more inspector level because, certainly
 15 in terms of response policing generally, the response
 16 policing senior officer will be an inspector, so
 17 probably that's the reason why it was pitched at that
 18 sort of level. Although no doubt there were sergeants
 19 and chief inspectors probably still included in that.
 20 SIR JOHN SAUNDERS: So it was a new idea in 2014. New ideas
 21 in training get received in different ways by the people
 22 who are being trained. What was the general reaction,
 23 if you can remember, to JESIP?
 24 A. I can only give a personal reaction, sir. My personal
 25 reaction would be it probably just put a little bit of

147

1 structure around what we generally did anyway. If there
 2 was an incident where all three services were there,
 3 let's say a fire, for example, I would look for the
 4 officer in the white hat and he would be my starting
 5 point. It probably just really gave some structure and
 6 framework around what was normal practice anyway.
 7 SIR JOHN SAUNDERS: But that wouldn't go as far as something
 8 you thought was a waste of time, the training?
 9 A. Definitely not.
 10 SIR JOHN SAUNDERS: You benefited from the structure?
 11 A. Yes, I think so, I think you benefit from any kind of
 12 training, really.
 13 MR DE LA POER: Let's look together now at some of the major
 14 incident plan which will include reference to a page
 15 devoted to JESIP, where we'll deal with that in a little
 16 more detail.
 17 {INQ007279/1}. It's a document we've looked at
 18 before and we're going to go straight to {INQ007279/21}
 19 as our starting point.
 20 Crop that in a little, Mr Lopez, focusing on the
 21 bottom two thirds. We want to just be able to see
 22 "Bronze commander" and below, if that's achievable.
 23 Thank you very much. We'll start there.
 24 Are you familiar with what this document says?
 25 A. I wouldn't say totally familiar with it --- do you mean

148

1 this section?
 2 Q. You presumably have had an opportunity at least to
 3 consider parts of it in preparation for today.
 4 A. Yes, sorry, yes.
 5 Q. And did that preparation include considering this
 6 section?
 7 A. Yes.
 8 Q. When you read this section did that strike you as being
 9 consistent with what your understanding of your role on
 10 the night was or different?
 11 A. It would be consistent with it.
 12 Q. We can see the third of the bullet points marked
 13 there is that the Bronze commander/operational commander
 14 was expected to have:
 15 "... an understanding of the role of each agency
 16 in the effective management and coordination of victims,
 17 survivors and relatives."
 18 Do you think on the night you had that
 19 understanding?
 20 A. Yes, I do. I think the only bit that I would say
 21 I didn't really have an understanding of at the time --
 22 I don't think I realised that many, if not all, of the
 23 Fire Service personnel were trauma trained. So when we
 24 are talking about first aid and trauma training, I think
 25 there are a few police officers who are trauma trained,

149

1 and I know you've heard from the firearms officers.
 2 There are some around who are public order medics who
 3 are, but everybody else is really just first aid trained
 4 like I was. I didn't realise that quite a lot of the
 5 Fire Service personnel are also trauma trained.
 6 Q. So in the joint exercising that you'd had, the other
 7 training that you'd received about acting as
 8 Bronze commander, and any other input that you'd had
 9 in the course of your experiences and exercising, that
 10 hadn't been sufficiently clear to you that you had it in
 11 mind on the night?
 12 A. I don't think so. I certainly had never seen
 13 a firefighter delivering first aid or trauma training at
 14 any incident that I'd been to where they were there and
 15 the Ambulance Service were there. It would be the
 16 Ambulance Service who would do that.
 17 Q. In training that you have undertaken since this
 18 incident, is that now made clear or did the nature of
 19 the training that you've received since not touch upon
 20 that as a subject matter?
 21 A. No, I think that should be clear to everybody now and
 22 there has been a joint video that has been put out about
 23 the capabilities of each of the three services so that
 24 officers from each service should understand the kit and
 25 the training that the other services have. That again,

150

1 for you, sir, is something that's been within the last
 2 probably year or so that that's come out.
 3 SIR JOHN SAUNDERS: Did you know at the time about the
 4 HART teams and the special fire teams?
 5 A. The HART teams I have seen in action because -- only
 6 in that they are identifiable by their green helmets.
 7 The fire service team, as I said before, I would say
 8 not, although I have seen many of their other
 9 specialities and capabilities.
 10 MR DE LA POER: There you may be referring to the SRT?
 11 A. Yes.
 12 Q. That wasn't a capability that, as we understand it, is
 13 relevant to a marauding terrorist firearms attack; you
 14 just didn't know about that?
 15 A. No, I don't think so I've seen them in action. You draw
 16 on experiences of incidents you've been to, I guess, in
 17 those initial minutes when I first arrived at this
 18 particular scene. So I hadn't seen them in action at
 19 all and now I am aware of some of the things they can
 20 do.
 21 Q. Next down:
 22 "Use the JDM..."
 23 Joint decision-making model?
 24 A. Yes, joint decision model.
 25 Q. "... to establish shared situational awareness by

151

1 agreeing a common view of the situation, its
 2 consequences and potential outcomes and the actions
 3 required for its resolution."
 4 When speaking about shared situational awareness, do
 5 you understand that to be a reference to inter-agency
 6 shared situational awareness?
 7 A. Yes, shared amongst the agencies that are there, yes.
 8 Q. The establishing of shared situational awareness as part
 9 of the Bronze commander's role, was that something that
 10 you had in mind on 22 May?
 11 A. Yes.
 12 Q. Two down:
 13 "Convene joint meetings and use the JDM to share and
 14 coordinate information, intelligence and operational
 15 plans to ensure multi-agency compatibility and a clear
 16 understanding of the initial tactical priorities and
 17 ongoing tactics."
 18 Again, something that you understood by 22 May?
 19 A. Yes. A lengthy paragraph, but I think in simple
 20 terms: get together, share what you know.
 21 Q. It may be that ultimately, as we will see, JESIP and the
 22 five principles say exactly that very succinctly.
 23 A. Yes.
 24 Q. If we can just -- are we seeing the last bullet point
 25 there, Mr Lopez? I think we may well be. Again, lots

152

1 of words, but:

2 "Use the JDM to construct a joint action plan and
3 the priorities necessary for its execution in sufficient
4 detail for each service to have a clear understanding of
5 the other responders' future activities by nature,
6 location and time. Understand all the multi-agency
7 operational commander roles, core responsibilities,
8 requirements and capabilities (including gaps)."

9 So obviously, capabilities we've already touched
10 upon in a previous one. Again was that part of what you
11 understood your role to be on 22 May?

12 A. Yes. I think the first bit of it, construct a joint
13 action plan, that suggests a written plan. I think in
14 an emergency situation such as it was, that's impossible
15 to do. So it has to be a verbal plan and by doing that,
16 it's what people can remember and what people understand
17 about it. So certainly not an action plan as such in
18 writing.

19 SIR JOHN SAUNDERS: So in a way the wording, although you
20 can understand the sentiments, the wording is not
21 perhaps very appropriate for getting across what you
22 need to do in a real life situation?

23 A. No, sir. There's a lot of words, aren't there?

24 SIR JOHN SAUNDERS: And it does sound a bit like sitting
25 around a table, as you say, with a flip chart and

153

1 writing things on it when you've agreed things.

2 A. We may move on to that later, but in a slow-time
3 situation, I think you can do that, and with JESIP --
4 again, another video that came out recently had -- you
5 may recall the Derbyshire dam that was going to burst.
6 That's a perfect example where JESIP and this plan will
7 work, where you've got the time to sit down and have
8 everything pretty much per the JESIP plan. I think when
9 it's something fast moving, dynamic, dangerous in some
10 ways, it's a lot more difficult to hit all those points.

11 SIR JOHN SAUNDERS: Thank you.

12 MR DE LA POER: Over the page {INQ007279/22}, please. I'm
13 being deliberately selective, others can take you to
14 those that I omit. The third from the bottom of the
15 bullet points:

16 "Update the tactical commander on any changes,
17 including any variation in agreed multi-agency tactics,
18 within the geographical or functional area of
19 responsibility."

20 Again, something that you understood on 22 May to be
21 within your responsibilities or not?

22 A. Yes, that certainly makes sense, yes.

23 Q. Then finally, in the free(?) text paragraph beneath the
24 list there is a reference to tabards. You didn't wear
25 a tabard on the night?

154

1 A. I didn't, no.

2 Q. The NWAS operational commander, consultant paramedic
3 Dan Smith, did, as did his replacement Mr Hynes. From
4 your point of view, in terms of a spontaneous incident
5 of this nature, based upon how things were arranged
6 within GMP at the time, was you having access to and
7 wearing a tabard a realistic expectation?

8 A. It would be realistic in that I did have one. I didn't
9 have it with me that night. I would normally -- I think
10 I'm pretty identifiable by the pips and in many other
11 situations, if I've got my high-vis jacket on, they're
12 ready -- I think I would be quite easily identifiable.
13 But I didn't have the tabard with me that night, no.

14 Q. Obviously you're identifiable by your pips, but if there
15 were -- do those just mark you out as an inspector or as
16 a Bronze commander?

17 A. As an inspector.

18 Q. So in the event there are a number of inspectors on
19 site, you can see no doubt the risk of confusion or
20 people going to the wrong police officers when seeking
21 out the Bronze commander?

22 A. I could see that. I think on this particular night, had
23 anybody gone to any of the officers, certainly in the
24 City Room, they would have pointed them in my direction.

25 SIR JOHN SAUNDERS: Obviously that's true, but if you're

155

1 looking for someone who's easily identifiable you can go
2 to quickly, then actually wearing a tabard identifying
3 your position may be of assistance?

4 A. It would, sir, and that probably is why they were issued
5 on the course and certainly in the Fire Service they are
6 very keen on tabards and they have a range of them and
7 that's probably where it came from.

8 MR DE LA POER: It's important that if there are going to be
9 changes made for the better that they are not
10 unrealistic because then they won't be for the better?

11 A. Mm-hm.

12 Q. Are tabards a good idea in your view?

13 A. Yes. If that's a quicker way of identifying somebody
14 and me not taking mine out that night, that is something
15 which I should have done, didn't do, but I don't
16 actually think it affected what we did that night.

17 Q. I suppose -- this is the last point on this page -- if
18 everybody understands that tabards will be worn, that
19 might focus minds on commanders getting together;
20 do you see what I mean? For example, I think you
21 mistook Mr Ennis as the Bronze commander.

22 A. Yes. He wasn't wearing a tabard.

23 Q. No, quite.

24 A. But he had two or three pips, so for me, that's...
25 I knew the sort of -- he was similar to my level, if

156

1 that's the right way of putting it .
 2 Q. Might it be the case that your expectation that tabards
 3 wouldn't necessarily be worn might have led you to make
 4 that mistake, understandable as it is?
 5 A. Yes, but I think --- I accept your point, but the person
 6 who was wearing the tabard, I wasn't really in the same
 7 location as him.
 8 Q. I don't think you saw him at any point in the first hour
 9 and a half?
 10 A. No.
 11 Q. {INQ007279/25}, please. We've seen this before. Which,
 12 if any, of the roles which are identified would you
 13 regard yourself as having held on the night?
 14 A. Inner cordon and outer cordon are the ones I actually
 15 performed. Evacuation manager. Traffic manager to an
 16 extent initially and then somebody else I asked to carry
 17 on that role had that.
 18 Q. When we look at this, we should equate the word
 19 "manager" with "commander", should we?
 20 A. Yes.
 21 Q. I think, as we will come to discover, your colleague
 22 Inspector Cooklynn took over the outer cordon
 23 position ---
 24 A. Yes.
 25 Q. --- when he was in a position to do so.

157

1 A. Yes.
 2 Q. But the roles that you've identified , bearing in mind
 3 that you were among the very first to arrive , if not the
 4 first , did you hold a number of those roles concurrently
 5 until you were relieved of individual parts?
 6 A. Yes, I would say so, and probably, just looking at it
 7 again, the RVP manager. I'm sure you'll come on to RVP,
 8 but I suppose I was that as well in effect .
 9 Q. But is the one role that you held throughout the entire
 10 period that this inquiry is focused on that of inner
 11 cordon manager?
 12 A. Yes.
 13 Q. I said we were going to come on to JESIP in this manual
 14 and we'll do so now. {INQ007279/34}, please. When it
 15 comes to looking at the principles for joint working,
 16 rather fewer words here. Were you familiar with all of
 17 these principles ?
 18 A. Yes.
 19 Q. On one part of this page is, in the bottom right-hand
 20 corner, the acronym METHANE.
 21 A. Yes.
 22 Q. Were you familiar with METHANE as a concept on the
 23 night?
 24 A. As a concept, yes.
 25 Q. Would I be right in understanding that at no point did

158

1 you broadcast something in the format of a METHANE
 2 message?
 3 A. No, I didn't. I'd been on the course 3 years
 4 beforehand, I can't think that I went to any other
 5 incident where I used it, and it just wasn't --- that
 6 format wasn't in my muscle memory where... But I do
 7 think during the course of my transmissions all those
 8 factors were covered, other than the major incident
 9 declared and possibly the hazards. All the other ones
 10 were given as part of my radio transmissions.
 11 SIR JOHN SAUNDERS: Did anything precede METHANE?
 12 A. SADD CHALETS, sir.
 13 SIR JOHN SAUNDERS: Thank you. And was that in your mind?
 14 A. No, it wasn't, sir , no. I think a mnemonic like that is
 15 good to keep you on track, but had comms prompted me
 16 in that format, obviously I could easily have answered
 17 any of those, but it wasn't something that sort of came
 18 naturally and the updates I gave were certainly not
 19 in that order but did include the information that was
 20 required.
 21 SIR JOHN SAUNDERS: I understand what you're saying. You
 22 did give all the information?
 23 A. Yes.
 24 SIR JOHN SAUNDERS: Thank you.
 25 MR DE LA POER: One that you've identified that you didn't

159

1 give is the first in there. At any point did it cross
 2 your mind that it was necessary for a major incident to
 3 be declared?
 4 A. Yes, I think it was without a doubt a major incident,
 5 but I probably assumed that either the FDO or Silver
 6 commander had already declared that. For completeness,
 7 I certainly should have declared it and that was an
 8 oversight by me.
 9 Q. Did you have the authority to do so?
 10 A. Yes, anybody can. Any officer could.
 11 Q. Over the page, {INQ007279/35}. The inquiry has already
 12 had a deal of evidence on forward command posts. Were
 13 you familiar with the concept of a forward command post
 14 in May 2017?
 15 A. Yes, I was. I would say in terms of a post, that
 16 suggests sort of a fixed location, which --- for other
 17 incidents I had been to it might be a command vehicle.
 18 In a sense that's one way of saying forward command
 19 post. Another way of saying it, which is probably the
 20 one I would use now, would just be a place to gather
 21 really, a particular point where commanders should
 22 gather.
 23 Q. So a commander gathering point?
 24 A. Yes.
 25 Q. Did you have in your mind in the course of the first

160

1 hour or so that a commander gathering point was
 2 something you should be thinking of?
 3 A. It probably wasn't at the forefront of my mind there.
 4 I think the two commanders who were in the room, we
 5 certainly did gather together and we did speak
 6 regularly.
 7 Q. Let's identify who those are. Who are you speaking
 8 about when you say the two commanders that were in the
 9 room?
 10 A. Paddy Ennis from NWSA and, really, I suppose the other
 11 one that I was referring to would be more the BTP police
 12 officers there.
 13 Q. Any particular one of them?
 14 A. No. I think there was more than one sergeant there.
 15 I think I spoke to more than one sergeant there. In
 16 terms of the other agencies that were there at that
 17 time, it was just GMP, NWSA and BTP.
 18 Q. On the subject of BTP and commanders, as we will see,
 19 there was at least Sergeant Wilcock and Sergeant Cawley,
 20 both from the BTP. Did you know either of those before?
 21 A. No, I have seen their names obviously in the documents.
 22 Q. And you will no doubt have followed within the inquiry
 23 that it was Sergeant Cawley who broadcast the BTP
 24 METHANE message?
 25 A. Right.

161

1 Q. Was it in your mind, as you were responding to the
 2 terrible situation that you were confronted with, that
 3 it was important for you to identify a single BTP point
 4 of contact so that you could coordinate?
 5 A. In the initial stages, there was only a sergeant there,
 6 or more than one sergeant as it turned out -- do you
 7 mean somebody of my rank?
 8 Q. Or simply somebody who was going to be the incident
 9 commander so far as BTP was concerned on the ground.
 10 A. No, I think if you take away BTP and GMP, the most
 11 senior officer was me, so I was the commander of that
 12 police response initially. But if I was going to speak
 13 to BTP I would want to speak to one of the sergeants,
 14 which is what I did.
 15 Q. Did you regard yourself as being the Bronze commander
 16 for both GMP and BTP?
 17 A. Yes.
 18 SIR JOHN SAUNDERS: The asset they may be is they would have
 19 much more knowledge of the actual area, the place
 20 itself, and the arena than you had, or did you know it
 21 quite well, the arena anyway?
 22 A. No, I didn't know it at all, sir, other than as
 23 a customer. I'd never been to an actual incident there
 24 before because, yes, they policed it. So certainly
 25 local knowledge they would have had.

162

1 MR DE LA POER: We'll come back to BTP in due course. We'll
 2 just continue moving our way through this document,
 3 although, of course, we can see on this page "rendezvous
 4 point". As we will see when we come to 22 May, you did
 5 identify a rendezvous point, didn't you?
 6 A. I did, yes.
 7 Q. So far as you are aware, was that rendezvous point used
 8 by GMP?
 9 A. No.
 10 Q. Have you managed to establish why that is or is that
 11 just simply a fact that you know and that's as far as it
 12 goes?
 13 A. Well, I was asked to nominate one along the way, which
 14 I did. I arrived at the scene soon after that and
 15 realised there was no reason why people couldn't come to
 16 the scene directly, so effectively the rendezvous point,
 17 I would say, became outside the station, Station
 18 Approach. However, again, I'll say I didn't say,
 19 "Cancel that RVP, the new one is this". I didn't use
 20 those words, but I think just by the way events
 21 happened, it became the RVP and that's where all the
 22 emergency services eventually came to.
 23 Q. Mr Lopez, {INQ007279/70}, please. We can see there the
 24 list of core roles. I'm just going to look at three of
 25 them. The first is at {INQ007279/72}. This is

163

1 identified as the first officer on scene. I can take
 2 you to it if I need to, but in paragraph 28 of your
 3 second statement you indicated a belief that you and
 4 Sergeant McGowan were the first GMP officers on the
 5 scene; is that right?
 6 A. Yes.
 7 Q. For that reason, did you, in addition to the Bronze
 8 role, fall into this category of person?
 9 A. Yes. I think I gave the first update from certainly
 10 within the City Room.
 11 Q. You did?
 12 A. Yes.
 13 Q. We've covered METHANE, but no doubt, having been the
 14 first officer at the scene, you then set about acting as
 15 the Bronze commander. We can have a look at that, it's
 16 {INQ007279/95}. It's the inner cordon manager, which
 17 you've told us was the role that you played throughout
 18 the key part of the night.
 19 Again, there's a lot of words, as there often is,
 20 and I don't mean that in a pejorative way, that's just
 21 a fact. Have you had an opportunity to consider this as
 22 part of your preparation for today?
 23 A. No, no.
 24 Q. We'll move through it then so we can have a look. It's
 25 talking towards the start about access and exit points,

164

1 briefing officers entering the cordon and ensuring
 2 they're clearly displaying their pass. Then in the
 3 table that we can see, the inner cordon, a risk
 4 assessment. I think that you did in fact conduct a risk
 5 assessment in your own mind on the night; is that right?
 6 A. Yes, certainly in my mind. I think this inner cordon
 7 wasn't set up according to a major crime scene with
 8 police tape and so on. If I said before that I was the
 9 inner cordon manager, there wasn't a cordon as such set
 10 up straightaway, if that makes it any clearer.
 11 Q. Certainly. I suppose what I'm really getting to, and if
 12 we could turn over the page {INQ007279/96}, I think to
 13 confirm, we can see that there are other duties there,
 14 but really what I was going to ask you about is how well
 15 this actually describes the role of Bronze commander as
 16 you played it on the night.
 17 A. As Bronze commander I was sort of managing the cordon.
 18 Q. Well, this is really what I was -- because there is no
 19 Bronze commander role within this list in the appendix,
 20 you see.
 21 A. Right.
 22 Q. If we can go back to {INQ007279/70} where it lists the
 23 core roles, it does include the tactical incident
 24 officer, but then it breaks it down by those categories
 25 that we looked at on that command and control page.

165

1 A. Right.
 2 Q. I'm really trying to see whether or not this actually
 3 does fairly describe what you were doing or whether you
 4 were doing something rather different to this.
 5 A. No, the things that are listed on there, get police
 6 cordon tape and find a trailer and so on that's on
 7 there, no, I didn't do that.
 8 Q. Very different in fact from the core duties you were
 9 performing?
 10 A. Yes.
 11 Q. That's not by way of criticism; I'm just trying to
 12 understand how this document interacts with what you
 13 were in fact doing on the night.
 14 A. I wasn't setting up police tape, that's for sure. And
 15 really, certainly at the time I was there, there was no
 16 tape put up to identify the cordon, it was just
 17 a natural geographical area, I guess, which was the
 18 City Room.
 19 SIR JOHN SAUNDERS: So you did think of the City Room as
 20 somewhere different from the rest?
 21 A. Eventually, sir, once all the casualties had been
 22 cleared from there, yes.
 23 MR DE LA POER: Just one more of these roles.
 24 {INQ007279/73}. It is described as:
 25 "Tactical Silver commander, also known as incident

166

1 officer on scene."
 2 You, as I understand it, were not trained as
 3 a Silver commander; is that right?
 4 A. That's right.
 5 Q. What this description is envisaging is the
 6 Silver commander at the scene?
 7 A. Yes.
 8 Q. As we know, the Silver commander expressly for unarmed
 9 assets, Night Silver, and his subsequent replacement,
 10 didn't go to the scene, did they?
 11 A. No.
 12 Q. Did you undertake any part of that tactical role at the
 13 scene in the absence of that person? Was there a void
 14 or is it something different?
 15 A. Do you mean by that did I make tactical decisions?
 16 Q. Yes.
 17 A. Yes, I think I did. I think I made some strategic
 18 decisions as well, really, which would be
 19 a Gold commander sort of role, because I was it when
 20 I first got there, so you've got to quite quickly do
 21 that, decide what's our strategy here, what tactics
 22 we're going to use and how we're going to do that. So
 23 I think in those first minutes I did do some of those
 24 roles.
 25 SIR JOHN SAUNDERS: Were you expecting someone to turn up?

167

1 A. A difficult one, sir, because -- in terms of
 2 a Silver commander, you mean?
 3 SIR JOHN SAUNDERS: Yes.
 4 A. Well, going back to the public order, Silver commander
 5 would never be on the ground for a public order
 6 operation, they would always be in the Silver control
 7 room. So I think the expectation there -- and perhaps
 8 what happened was that person needed to be in Silver
 9 control. I think in hindsight, and obviously there's
 10 a lot of debate around which commanders were there,
 11 I think in hindsight the Silver commander probably
 12 should have gone down and perhaps could have then had
 13 that full situational awareness and gone to the control
 14 room after that.
 15 SIR JOHN SAUNDERS: Were you in contact with him?
 16 A. He did phone me quite a way into the incident, which...
 17 MR DE LA POER: We will certainly come to look at around
 18 that. I have just been asked to ask you to keep your
 19 voice up again, please. That's not by way of
 20 a criticism at all.
 21 Just to develop that as we are dealing with it now,
 22 you have said that, with hindsight, had the
 23 Silver commander developed situational awareness from
 24 having gone to the scene and then to the Silver room,
 25 that might have improved things. In what way do you

168

1 envisage it might have improved things?
 2 A. It's very difficult to get a full picture of what's
 3 going on when you're not actually there. The radio
 4 transmissions are one way of doing it. If it was
 5 something on the street, perhaps in the comms room
 6 they'd be able to see what's going on through
 7 the council cameras, but clearly this was indoors, so no
 8 CCTV coverage that can be used in a control room. So
 9 for me, there's no question that I had to go there and
 10 that's the only way you can see properly what's going on
 11 and what needs to be done. So for anybody who's in
 12 a control room it's very difficult for them to fully
 13 understand what's happening and what's required.
 14 Q. What about if we consider it through the lens of
 15 a forward command point? You remained in or very close
 16 to the City Room for the entirety of the first hour and
 17 a half that you were there once you got there.
 18 A. Yes.
 19 Q. And as we will see, you were giving directions, you were
 20 being asked questions, you were deploying people, you
 21 were interacting with Mr Ennis and others. You had
 22 a lot to do?
 23 A. Yes.
 24 Q. Is that fair?
 25 A. Yes.

169

1 Q. If there had been a Silver commander at the scene from
 2 an early stage, so I'm talking about within the first
 3 hour, might one of their roles have been to coordinate
 4 an inter-agency response?
 5 A. Yes.
 6 Q. And would they have been better placed to do that than
 7 you were?
 8 A. If you're taking a step back from what's actually going
 9 on operationally, I think yes.
 10 Q. The final topic to deal with before we come to 22 May is
 11 Operation Plato. I think the easiest way for us to deal
 12 with this is -- can I invite you to turn up your second
 13 statement because you deal with it very comprehensively
 14 in there. Paragraph 58.
 15 Just have a moment to refresh your memory from that
 16 paragraph, inspector.
 17 A. Yes.
 18 (Pause)
 19 Q. Having done so, giving whatever caveats you need to,
 20 bearing in mind what you say in the statement, what was
 21 your understanding, do you think, of Operation Plato in
 22 May of 2017?
 23 A. I don't think I knew very much about it at all, really.
 24 Q. So if we try and explore that. If somebody had said to
 25 you at the scene, "Operation Plato has been declared",

170

1 what, if anything, would have come to your mind?
 2 A. As I think I put in the statement, it's very difficult
 3 to separate out now what I know about it, which is
 4 obviously a reasonable amount, and what I knew then.
 5 But I think, and this statement was written I think in
 6 2019, I think then I was aware that it was to do with
 7 terrorism but perhaps not that it was to do with
 8 specifically a marauding terrorist firearms attack.
 9 Q. So the word terrorism would have immediately come to
 10 mind?
 11 A. I think so, yes.
 12 Q. What about zoning and zones? Do you think you would
 13 have -- your next thought would have been, "Right,
 14 that's going to mean there's going to be zones imposed"?
 15 A. No, I don't think so, because I don't remember at that
 16 time having had any kind of training at all about it.
 17 I think in my statement I put that I might have had some
 18 awareness from an NCALT, which is the online training
 19 that is available to us, but having seen my training
 20 records now it doesn't look as though I had any training
 21 from that, so I maybe had a little bit of awareness just
 22 from general updates or perhaps no more than that
 23 really -- the force intranet, possibly.
 24 Q. So given your state of understanding, if somebody had
 25 described a particular area by reference to a hot, warm

171

1 or cold zone, would you have had to ask further
 2 questions to understand what that meant?
 3 A. Yes, I'd say so.
 4 Q. When do you think was the first time on 22 or 23 May
 5 that you became aware that Operation Plato had been
 6 declared by the FDO?
 7 A. I think when Chief Inspector Dexter arrived, because he
 8 spent some time in the City Room after he first arrived
 9 and I think he mentioned it to me then. But quite what
 10 detail he went into about it, I don't know, and really
 11 by that stage quite a lot of the initial work in the
 12 City Room had been done in terms of getting casualties
 13 out of there.
 14 Q. Can I just ask you to keep your voice up again?
 15 A. Sorry.
 16 Q. Not at all. I'm sure everyone has these timings clearly
 17 in mind, but we're talking about a time shortly after
 18 11.30?
 19 A. Yes.
 20 Q. Outside the golden hour when you were speaking to Chief
 21 Inspector Dexter?
 22 A. Yes, there or thereabouts.
 23 Q. One of the features of evidence that has been heard or
 24 has been provided in writing is how people might have
 25 reacted had they been told, for example, "This is a hot

172

1 zone, firearms officers only".
 2 A. Mm—hm.
 3 Q. You had, as we will come to see, conducted your own risk
 4 assessment and we'll look at the detail in a moment of
 5 what your thinking was. But you regarded it as
 6 a tolerably safe place for you to be?
 7 A. Yes. Safe enough, I think.
 8 Q. Was that risk assessment also carried out on behalf of
 9 those that you were commanding?
 10 A. Yes, because I think if it's safe enough for me, it's
 11 safe enough for everybody else, but I accept other
 12 people's perceptions may have been different.
 13 Q. Aren't you there putting your finger on one of the JESIP
 14 principles, the sharing of situational awareness and
 15 a joint risk assessment? That's two in fact.
 16 A. Yes. I was probably referring to my officers there, but
 17 yes, for everybody who's in there, really, was I taking
 18 responsibility there to say it was safe enough? Yes,
 19 I was, yes.
 20 Q. And if you had been told, "This is a hot zone, firearms
 21 officers only", would you, do you think, just have left?
 22 Is it too difficult to say or might there have been more
 23 of a conversation following that?
 24 A. I think there would be more of a conversation, but in
 25 principle, how could we have left? We had protection

173

1 from firearms officers around us, so in terms of
 2 anybody, a marauding terrorist, getting into that room,
 3 I was satisfied in my own mind that we had enough
 4 firearms assets there to deal with that.
 5 SIR JOHN SAUNDERS: Did part of your risk assessment involve
 6 talking to any of the firearms officers?
 7 A. I think I did talk to them, sir, but I don't really
 8 remember any discussion about Plato.
 9 SIR JOHN SAUNDERS: We know they'd done a sweep.
 10 A. Yes.
 11 SIR JOHN SAUNDERS: Did you know that, that they'd looked to
 12 see if there was a gunman?
 13 A. It was kind of — do you mean in the City Room or
 14 generally?
 15 SIR JOHN SAUNDERS: The City Room.
 16 A. I don't know any of that, but to me it was quite obvious
 17 there wasn't a gunman in there because I could see it.
 18 It's not — you'll have seen the photographs. It's not
 19 an area that's got little ...
 20 SIR JOHN SAUNDERS: That is true, but we do know there are
 21 places to hide in the City Room.
 22 A. Yes. But an explosion had happened there. It would be
 23 quite a determined terrorist to still be hiding whilst
 24 that's happened. So I think in terms of the risk
 25 in that room to me personally, I felt it was quite low.

174

1 SIR JOHN SAUNDERS: Thank you.
 2 MR DE LA POER: We've dealt with the hot zone scenario.
 3 Perhaps it's obvious from your previous answer, but if
 4 you had been told, "This is a warm zone, personnel with
 5 appropriate training and ballistic protection only",
 6 again, would there have been a discussion or would
 7 you have just left?
 8 A. No, there would have been a discussion, but certainly
 9 not to up and go. No way, no.
 10 Q. Although your situational awareness will necessarily not
 11 be exactly the same as others', at any point did you
 12 regard this as being a marauding terrorist firearms
 13 situation?
 14 A. No. We may come to it in the audio schedule, but there
 15 was only one suggestion that I heard that night of any
 16 gunshot wounds and it was very quickly cancelled by
 17 somebody saying, "No, no, it's not gunshot wounds, it's
 18 shrapnel wounds". That was the one and only mention of
 19 any gunfire at all.
 20 Q. I'm going to turn now to 22 May and no doubt pick up on
 21 some of the themes that we've already touched upon.
 22 Were you on duty in uniform that night?
 23 A. I was, yes.
 24 Q. At about 10.30, where were you?
 25 A. I was just coming into Central Park Police Station.

175

1 Q. For those who might not know the geography,
 2 approximately how far is Central Park Police Station
 3 from the Victoria Exchange complex?
 4 A. Two to 3 miles north.
 5 Q. Under blue lights, how long would it take?
 6 A. Three or 4 minutes.
 7 Q. Were you paired with anyone that night?
 8 A. No, I wasn't, I was by myself. I'd come on duty at my
 9 home station, which is Longsight, driven to Central Park
 10 Police Station, and I'd literally walked in the
 11 building, going up the stairs, when I was shouted up
 12 over the radio.
 13 Q. Were you at the time wearing any PPE?
 14 A. Yes, body armour, yes.
 15 Q. Was that ballistic armour?
 16 A. It has an element of that and an element of
 17 stabproof—ness, yes.
 18 Q. We're going to turn to the audio schedule now, please.
 19 Do you have it in front of you?
 20 A. Yes.
 21 Q. The first entry is timed at 22.34.41; do you see that?
 22 A. I do, yes.
 23 Q. I think it begins with your collar number?
 24 A. Yes.
 25 Q. You reply, "Go ahead".

176

1 A. Yes.
 2 Q. And you are told firstly the FWIN number?
 3 A. Yes.
 4 Q. And then:
 5 "Urgent. Explosion at the foyer McDonald's at
 6 Manchester Arena, up to -- upwards of 30 to 40 people
 7 injured."
 8 And do you reply that you are at Central Park Police
 9 Station and do you go on to say that you'll head down
 10 there?
 11 A. I said I'll have a look at the FWIN and then head down
 12 there. I was literally on the stairs up to where the
 13 sergeant's office and inspector's office is.
 14 Q. And did you go and have a look at the FWIN?
 15 A. I did, yes.
 16 Q. What did you learn from that at that stage? What were
 17 your headline takeaways from having looked at that?
 18 A. I think that there was a -- obviously, the job was
 19 created as an explosion and there seemed to be lots of
 20 other calls on that FWIN. So to me, straightaway I was
 21 thinking, well, something's happened, it's not a hoax or
 22 anything like that.
 23 Q. How long do you think it was before you were in
 24 a vehicle driving to Victoria Railway Station?
 25 A. Within 2 minutes. I literally looked at it, one of the

177

1 sergeants who was in there, Sergeant McGowan, he said,
 2 "Do you want me to come with you?" We walked back out
 3 to my car, because I'd literally just parked it up, so
 4 I drove down there and Sergeant McGowan was with me in
 5 the passenger seat.
 6 Q. If we look at the next entry, which is timed 1 minute
 7 and 20 seconds later, do we see that having made
 8 reference to the channel that you're on, there's
 9 a repetition of some of the information you'd gleaned
 10 from the FWIN and then are you asked by the radio
 11 operator:
 12 "Where do you want the RVP, boss?"
 13 A. Yes.
 14 Q. Do you say:
 15 "The cathedral, you know, there's a parking area
 16 outside the cathedral."
 17 A. Yes.
 18 SIR JOHN SAUNDERS: At this stage are you familiar generally
 19 with the parking areas around the arena or close to the
 20 arena?
 21 A. Yes, sir, I've worked in the city centre for quite some
 22 time, so yes.
 23 SIR JOHN SAUNDERS: Thank you.
 24 MR DE LA POER: Let's just bring this up on the map just to
 25 understand where you were indicating.

178

1 (Pause)
 2 {INQ038877/2}.
 3 We're not going to spend too much time on this, but
 4 talk us through what we can see here. Towards the top,
 5 just off centre, do we see an X marked by you with "MS"?
 6 A. Yes.
 7 Q. Is that where you were indicating you were intending to
 8 convey when you gave that RVP?
 9 A. Yes.
 10 Q. At about 4 o'clock from that X, do we see the
 11 distinctive shape of the cathedral?
 12 A. Yes.
 13 Q. So from that X, I don't think it's marked on here, but
 14 where would the Victoria Exchange complex be, off
 15 towards the right?
 16 A. Yes, the top right -- you mean for the arena?
 17 Q. Yes.
 18 A. Yes, top right. It's just north of Chetham's on that.
 19 Q. Is that a car park that you --
 20 A. Yes, it's not now, but I think at that time it was
 21 a sort of open NCP car park. So coming down towards the
 22 cathedral, that's like a bridge, really, where people
 23 could park. So it's a bridge over the River Irwell and
 24 also I think it's Chapel Street sort of directly below
 25 where the cross is, so it led to an even bigger open car

179

1 park, which now there's a building, an office building
 2 built on.
 3 Q. Thank you. We can take that down, thank you, Mr Lopez.
 4 Returning to the schedule, the fourth entry,
 5 22.36.52, do you repeat where you intend the RVP to be?
 6 A. Yes.
 7 Q. 22.37.08, which is entry 1563. You can just familiarise
 8 yourself with that. The entry that I'm particularly
 9 interested in is the third from the bottom, which reads:
 10 "Yes, received. Can we phone that person back?"
 11 I think that's a reference to the person who'd given
 12 information about casualties?
 13 A. Mm-hm.
 14 Q. Is that right?
 15 A. Yes.
 16 Q. "Just see if you can get a bit of an update from him and
 17 could you ask one of your colleagues to let Night Silver
 18 know, please."
 19 A. Yes.
 20 Q. Why was it important, obvious though it may be, for
 21 Night Silver to be contacted?
 22 A. Because from the start this sounded like a very serious
 23 incident and the Night Silver is the superintendent
 24 responsible during the night for the whole of GMP, so
 25 anything serious should be brought to his or her

180

1 attention.

2 Q. Did you know who the Night Silver was that night?

3 A. Yes.

4 Q. That appeared in information that you had when you'd

5 come on shift?

6 A. Yes, and also Superintendent Nawaz was one of the City

7 of Manchester superintendents anyway.

8 Q. So he was someone you knew?

9 A. Yes, I did.

10 Q. Had you worked with him before in the capacity you as

11 Bronze, he as Silver?

12 A. I don't know. I don't know. But certainly he would --

13 during the day, as a response inspector, there would be

14 a morning meeting. If he was the duty superintendent

15 for that day, he would chair that meeting. I'd never

16 worked directly for him, but I did know him, definitely.

17 SIR JOHN SAUNDERS: He would have been at a meeting with you

18 some time in the morning?

19 A. No, what I mean, sir, is had I been on earlies rather

20 than nights, every day there's a meeting in the morning.

21 SIR JOHN SAUNDERS: And he would chair it?

22 A. And if I was -- and he would chair it. So I'd know him

23 in that respect rather than having worked closely with

24 him.

25 SIR JOHN SAUNDERS: Thank you.

181

1 MR DE LA POER: Next, I think we're coming to something that

2 you've already highlighted. Page 2, row 1722, 22.40.18.

3 What you say there is:

4 "If there's already an officer on scene rather than

5 the RV point, could you ask/officers to make to

6 him/officers to make it to the scene/directly, please,

7 staff, if they make... directly, please."

8 A. Yes.

9 Q. Is this intended as an instruction to cancel the RVP

10 that you had given a few moments ago or something

11 different?

12 A. Well, without saying it in as many words, the RVP --

13 maybe go there until we know what's going on, but it

14 appeared from information there that we had a little bit

15 of an idea that there was nothing going on directly

16 outside and then I've said, yes, let's get people

17 directly there --

18 SIR JOHN SAUNDERS: So you're not there by now?

19 A. No I'm not, sir, no. But the operator has asked me

20 afterwards, straightaway, "Just confirm, officers to

21 make direct?"

22 MR DE LA POER: Is the effect of this to cancel the

23 Cathedral car parking area as an RVP?

24 A. Yes, that's what --

25 Q. That's what (overspeaking)?

182

1 A. -- I had intended for the police staff who were going

2 there, yes, definitely.

3 Q. So again, I appreciate you're travelling to an incident,

4 you haven't yet arrived, you don't know what you're

5 going to be confronted with. The two exchanges you've

6 had, the one nominating the car park and then this one

7 instructing officers to go straight to the person who's

8 on scene, do you think there's any risk that that might

9 cause confusion or are the processes well enough

10 understood to be able to cope with that?

11 A. It might have caused confusion, but in my mind I think

12 I'd given a clear direction there that officers are to

13 make it to Victoria Station itself.

14 SIR JOHN SAUNDERS: You have said no one went to the car

15 park; did they come to the scene direct?

16 A. Yes.

17 MR DE LA POER: Well, it may be the confusion could have

18 manifested in this way. We know that after 11.30, the

19 precise time escapes me, when the Fire and Rescue

20 Service asked for an RVP, they were told the Cathedral

21 car park.

22 A. Yes and whoever gave them that may have just read it

23 from the log. The operator would have typed that on.

24 Q. But at all events it was clear in your mind that so far

25 as GMP were concerned, they were to go directly to the

183

1 scene?

2 A. Yes, and subsequently NWAS, yes.

3 Q. We'll hear what you say about NWAS in particular.

4 For the future, bearing in mind the importance,

5 certainly within JESIP, of a joint RVP, do you think

6 having an area within the control system to identify the

7 multi-agency RVP that can be updated rather than

8 somebody trawling through the log and potentially coming

9 to an entry that's been superseded would be a good idea?

10 A. Do you mean, say, for example, for the arena having

11 a predetermined RVP?

12 Q. Not predetermined but a way to access where is the RVP

13 for the control room operators. It may be beyond your

14 sphere, but you've initiated this with nominating one,

15 you've then effectively rescinded that and given

16 another, although you've not used the term RVP, yet what

17 we have found is later in the incident the RVP you gave

18 within minutes is being cited to an emergency service

19 partner.

20 A. Yes.

21 Q. So it's just whether you have any observations or

22 insight as to how that might be avoided for the future.

23 A. Yes, it would be in terms of the command and control

24 system that we use, how the jobs are created, so that's

25 probably not my speciality, but anything that avoids

184

1 confusion and provides clarity , yes, I definitely would
 2 agree that would be something to work towards, yes.
 3 Q. Next, we are going to look at the first of many stills
 4 involving you at the Victoria Exchange complex. Can
 5 I give this warning to everybody, please, that
 6 I anticipate, even today, we will get to stills of you
 7 in the City Room. They will be stills which by and
 8 large have already been shown, they have all been
 9 redacted in the way that those who have been following
 10 are familiar with, but they do show the City Room at
 11 least in small part. So I give everybody that warning
 12 now, but I will seek to make it clear when we get to the
 13 first one as we arrive at it .
 14 The first still to look at, please, Mr Lopez, is
 15 within {INQ035612/89}.
 16 We are, thanks to the good offices of those who have
 17 compiled this very substantial document, able to see
 18 your arrival on Station Approach here, timed at
 19 22.44.31. So you are arriving almost exactly 10 minutes
 20 after that first radio shout to you?
 21 A. Yes.
 22 SIR JOHN SAUNDERS: You're in that van, are you?
 23 A. No, sir, I was a car, I think.
 24 MR DE LA POER: I think it's the car in the top right-hand
 25 corner, sir, that's being indicated.

185

1 SIR JOHN SAUNDERS: Okay.
 2 A. That is where I parked. Perhaps the lights of the other
 3 one are obscuring it a bit.
 4 MR DE LA POER: In your second witness statement, we can
 5 look at it if we need to, but I'm sure you'll have it
 6 well in mind, you acknowledge that it was in your mind
 7 that the area that you were travelling to and had
 8 arrived at was an area which BTP constables had
 9 jurisdiction .
 10 A. Yes.
 11 Q. What you say is this -- it's a very short paragraph:
 12 "As the arena, from a policing perspective, falls
 13 under the responsibility of BTP to police, technically
 14 BTP could have taken primacy from the outset. I was
 15 clear in my mind, however, that from my arrival at the
 16 arena, the incident was under GMP control."
 17 A. That's probably a bit premature in terms of -- at my
 18 arrival at that point, no. My arrival once I was in the
 19 City Room and understood fully what had happened, yes.
 20 Q. So where it says "arrival at the arena", we should read
 21 arrival in the City Room after you have made an
 22 assessment?
 23 A. I think so, because where I arrived is actually
 24 Victoria Station, so it's not that point on that
 25 photograph.

186

1 Q. Not there, but once you get to outside the arena?
 2 A. Once I understood what was happening, yes.
 3 SIR JOHN SAUNDERS: That is because of the seriousness of
 4 the offence?
 5 A. Yes, sir .
 6 SIR JOHN SAUNDERS: The seriousness of the situation?
 7 A. Yes, sir .
 8 SIR JOHN SAUNDERS: That it would be GMP's rather than
 9 BTP's?
 10 A. Yes, and also I was the only inspector there, sir, at
 11 that point.
 12 MR DE LA POER: Had there been a BTP chief inspector, would
 13 that have made a difference to your conclusion?
 14 A. If there'd been one there when I arrived there?
 15 Q. Yes.
 16 A. No. Again, we probably would have had a discussion
 17 about what role we were going to take.
 18 Q. So to the extent it's possible for you to just tease
 19 this out, is it because you were the most senior police
 20 officer there that put it effectively under GMP control
 21 because you were GMP or is there some other wider reason
 22 why you regarded it as a GMP --
 23 A. I think in terms of the seriousness, first of all, the
 24 fact that there were firearms officers there, that BTP
 25 at that stage didn't have, and that quite soon it was

187

1 apparent it was a terrorist incident, which we would
 2 have the lead role in.
 3 SIR JOHN SAUNDERS: It may be perfectly obvious and I well
 4 understand that, but is there any direction anywhere
 5 that you knew of or any indication of when you or BTP
 6 would take primacy when you're dealing with cases like
 7 this?
 8 A. In terms of the geographical area, if it was
 9 a day-to-day job, that would be their job, sir. But for
 10 this it was clearly so serious, somebody needed to --
 11 SIR JOHN SAUNDERS: But at that time was that written down
 12 anywhere? Just common sense really?
 13 A. I think so.
 14 MR DE LA POER: The next still, please, within that, page 95
 15 {INQ035612/95}. You are, having checked briefly on
 16 a couple of injured casualties who are just outside the
 17 war memorial entrance, about to enter the station and
 18 we can see the legend there indicates that you are using
 19 your police radio. Can I, whilst that's on the screen,
 20 just refer your attention to entry 2000 on the audio
 21 schedule.
 22 We can see that that is timed 6 seconds after this
 23 still . Do you have that?
 24 A. Yes, I do.
 25 Q. 23.45.21. You describe yourself as:

188

1 "State 6 outside Victoria Station."
 2 A. Yes.
 3 Q. And you indicate that there is a female casualty there
 4 and you identify PC Struttman as being someone who is:
 5 "... going to close off the bottom end of
 6 Hunts Bank."
 7 And that you need another officer going to the
 8 Corporation Street end?
 9 A. Yes.
 10 Q. Why were you deploying those officers in that way?
 11 A. To create an area where we could work and, potentially,
 12 vehicles could arrive.
 13 Q. So in furtherance of the rendezvous point being outside
 14 Station Approach?
 15 A. Yes. Could I just say, as well, there are various
 16 stills that I have seen saying I am using my police
 17 radio. I might not always be using it in terms of
 18 transmitting, I might be listening. The way I wear mine
 19 is without an earpiece on my body armour, so when it's
 20 noisy and so on, to hear it sometimes I will hold it to
 21 my ear. So it may look as though I'm transmitting but
 22 I'm not, I'm either transmitting or listening.
 23 Q. I entirely understand and I have done my best, as I hope
 24 will be apparent, to tie those stills which match with
 25 actual broadcasts together but you are right to observe

189

1 that there will be occasions on which you're identified
 2 as handling your radio where there won't necessarily be
 3 an entry that we'll be looking at.
 4 A. Thank you.
 5 Q. {INQ035612/99}, please. Here we capture you within the
 6 Victoria Exchange complex.
 7 A. Mm—hm.
 8 Q. And you're walking towards what we've been referring to
 9 as the station concourse.
 10 A. Yes.
 11 Q. That's timed at 22.45.56. We have audio which appears
 12 to correlate with that, row 2057. This is timed at
 13 22.45.58. Do you broadcast:
 14 "From Sergeant McGowan. BTP are inside. They're
 15 saying the major casualties are inside. I'm just going
 16 to track them down now."
 17 A. Yes.
 18 Q. So had your colleague Sergeant McGowan learned something
 19 about the BTP officers?
 20 A. Yes, from that I would take it that he spoke to at least
 21 one of them.
 22 Q. Thank you, Mr Lopez.
 23 We can then move through some stills.
 24 {INQ035612/102}. You are identified on the station
 25 concourse as having a brief conversation with firearms

190

1 officers. Do you recollect that conversation?
 2 A. I don't recollect the conversation. I do recollect
 3 speaking to them because I remember they were putting
 4 their ballistic helmets on.
 5 Q. Did you gain any situational update from them or did you
 6 both — either of you know exactly what had gone on at
 7 that point?
 8 A. No, I don't think I got any more, I just needed to find
 9 out what was happening really for myself.
 10 Q. Then we can track you, {INQ035612/104}, going up the
 11 stairs.
 12 22.47.26, about to enter the City Room,
 13 {INQ035612/108}.
 14 I'm just going to pause for a moment, if we may,
 15 please, inspector, just to indicate that we are now
 16 going to move to a sequence which will take us to the
 17 end of today, which will involve looking at images of
 18 the City Room, redacted in the way that I have described
 19 them. So I will just pause very shortly and then we can
 20 look at those.
 21 (Pause)
 22 Mr Lopez, the next page to look at is
 23 {INQ035612/114}. We can see, this is just a couple of
 24 seconds after that previous still, about 40 seconds.
 25 22.48.06. You are in the City Room; is that right?

191

1 A. Yes.
 2 Q. And you are identified together with PS McGowan as
 3 speaking to two firearms officers. Do you recall who
 4 were speaking to at that point in terms of the names of
 5 the firearms officers?
 6 A. No.
 7 Q. Did either of them identify themselves as the OFC?
 8 A. Not that I remember, no.
 9 Q. At any stage in the evening did you ask to speak to the
 10 OFC?
 11 A. No.
 12 Q. That you can recall?
 13 A. Not that I can remember.
 14 Q. Was speaking to the OFC in the course of the first hour
 15 or so something that you should have done or would it
 16 not have been appropriate?
 17 A. Whoever I spoke to from there, I think I was aware that
 18 they were doing a search of the arena, really. So most
 19 of their activity, to me, seemed to be on the concourse
 20 and arena side of the whole complex rather than in the
 21 City Room itself, albeit I could see that there was
 22 armed protection for us really at the doors. So in
 23 hindsight, having heard some of that evidence, yes,
 24 he was another commander and I could have asked to speak
 25 to him, but if I did I don't remember the content of the

192

1 conversation.

2 Q. We've dealt with this to a degree particularly in terms

3 of your learning of when Operation Plato had been

4 declared. In fact, this conversation with these

5 firearms officers, not that you knew it at the time, was

6 less than a minute after Operation Plato had been

7 declared.

8 A. Right.

9 Q. In the course of the statements you've provided, you

10 indicated that you decided that you would be the

11 Bronze commander; is that a fair summary?

12 A. Yes, but again I don't think I declared that over the

13 radio at all. I was the city centre response inspector,

14 so that was naturally the role that I was going to take.

15 Q. Within the structures of GMP, can a person self-appoint

16 as a Bronze commander or by the book should they be

17 appointed by the tactical commander?

18 A. No, I would think they could self-appoint.

19 Q. We've seen the BTP major incident manual indicates the

20 Bronze commander, and I appreciate they have a different

21 area of policing responsibility to Greater Manchester

22 Police, but within their major incident manual the

23 Bronze commander is appointed by the Silver commander.

24 Is that not the position in GMP as you understood it?

25 A. I would say, you know, within GMP it's welcome when

1 somebody takes the initiative and I don't think from my

2 point of view there was much initiative to be taken

3 because I was the response inspector responsible for

4 that city centre. So whilst I didn't declare it over

5 the air, that's what I was.

6 Q. Having decided to be Bronze commander, did you develop

7 a plan for how you would discharge that role?

8 A. In terms of what we needed to do?

9 Q. Yes.

10 A. Yes. I think it was quite clear to me straightaway,

11 really, that there had been an explosion, that there

12 were some badly injured people there, and we needed

13 a strategy for how we were going to deal with those.

14 I do remember walking round the room, probably trying to

15 think about what do I need to do to get a grip of this,

16 really, and I think my strategy from a pretty early

17 stage was: we need to get the people who are injured out

18 of here, longer term this is a crime scene, it'll need

19 sealing, if you like, and then looking at sort of the

20 resources that we would need, the tactics, if you like,

21 to get those people out of the room.

22 Q. What was your immediate priority?

23 A. Preservation of life, the people who were injured.

24 Q. I think we'll just have time to deal with this topic.

25 We've already touched upon risk assessment a number of

1 times. Can I invite you to turn to paragraph 48 of your

2 second statement. Again, I just invite you to refresh

3 your memory from what you say there because it's

4 a substantial paragraph.

5 A. (Pause). Yes.

6 Q. I'm going to seek to capture it, but instead of me

7 reading it and asking you to adopt it, in your own

8 words, having refreshed your memory from what you've

9 said there in your statement, and it appears in

10 a similar form in your earlier statement, the one that

11 you gave closer to the incident, talk us through your

12 risk assessment and the conclusions that you reached.

13 A. Yes. I think I could see that a bomb had gone off,

14 I could see, I think, where possibly the seat of the

15 explosion had been. Then I needed to decide, was it

16 safe or safe enough for me and for everybody else to be

17 there. I did decide that I couldn't rule out the fact

18 that there may be other attackers or terrorists within

19 the complex, but I was pretty happy that there were no

20 other terrorists within the City Room itself. The rest

21 of the complex -- the arena is obviously quite a large

22 building, I couldn't rule that out at all, I could see

23 that there were some firearms officers present already,

24 I was aware I'd seen a couple coming in who were kitting

25 up, ready to go. So my guess was that there would be

1 more and more coming here, so I felt safe in that sense

2 from a firearms attack of any kind.

3 There was nothing over the air to me suggesting that

4 there was anybody roaming with a weapon. I've mentioned

5 before about the only hint of gunfire was quickly ruled

6 out so far as I was concerned. I couldn't rule out the

7 fact that there might have been a secondary device

8 there, but I think the rapid conclusion I came to was

9 that was unlikely. I could expand on the reasons why if

10 you --

11 Q. We will come to that, but did you have a sense of how

12 much time had passed since the explosion when you

13 entered there and, if so, did that form any part of your

14 thinking?

15 A. Well, in terms of a sense, I suppose the time from being

16 told, the travelling time, so in that way, it's easily

17 15 minutes had gone by. In that 15 minutes, I hadn't

18 heard anything about anybody roaming round or anything

19 similar.

20 Q. You said you can expand upon what you said about

21 secondary devices. It's important here and I am

22 conscious that we don't want to stray into anything that

23 might be operationally sensitive. I don't know

24 precisely what you're going to say. I'm certainly not

25 inviting you to say anything that may be operationally

1 sensitive , but if you have confidence that you are not,
 2 you're hugely experienced, could you please explain?
 3 A. Yes, I will try to. I think from the training I had
 4 previously as a police search adviser, part of that,
 5 it's a joint military and police training programme, it
 6 obviously gives you some awareness of terrorist methods
 7 of attack and albeit it was a fair time before that when
 8 I was a licensed (inaudible: coughing) officer, I still
 9 had that awareness, general awareness from the media and
 10 so on. I think in those few minutes, I thought it was
 11 pretty unlikely that a device would go off and another
 12 one would be in the same room.
 13 For historic things --
 14 SIR JOHN SAUNDERS: I think we'll stop there. Thank you.
 15 I understand the point.
 16 A. Yes, thank you.
 17 MR DE LA POER: Having conducted that risk assessment, other
 18 than, so far as I can tell , a brief period when you
 19 stepped into the arena concourse and came back, you
 20 remained in the City Room, didn't you, for well over
 21 an hour and a half?
 22 A. Yes, because that really had to be the focus of what
 23 I needed to do and what everybody else needed to do.
 24 MR DE LA POER: Sir, I wonder if that might be a convenient
 25 moment.

197

1 SIR JOHN SAUNDERS: It would be. Let me check on this: we
 2 know and we've been hearing a lot about the FDO and how
 3 he's managing what's going on certainly with the
 4 firearms assets and I know you did talk to him at some
 5 stage later , but up until now had you had any contact
 6 with the FDO at all?
 7 A. No, sir. I don't think I spoke to him at all that
 8 night, the FDO at all. That was a Silver commander that
 9 you might be referring to.
 10 SIR JOHN SAUNDERS: No, I am referring the FDO, but if I've
 11 got that wrong, I'm sorry.
 12 A. I didn't speak to him at all that night and, no, he
 13 wasn't on the channel that we were on, you know, the
 14 city centre channel, if you like ; I think he was on the
 15 firearms channel. So there were no transmissions made
 16 over that firearms channel that --
 17 SIR JOHN SAUNDERS: No, no, but could you contact the FDO?
 18 A. Yes, I could phone him, yes.
 19 SIR JOHN SAUNDERS: Is that something that occurred to you
 20 or really are what the FDO is doing and what you're
 21 doing really pretty separate?
 22 A. Yes, that's how I felt , and the firearms officers ,
 23 I felt , were doing something separate to what my
 24 officers were doing. So, no, we had no contact that
 25 evening at all .

198

1 SIR JOHN SAUNDERS: Thank you. I'm really sorry, it's my
 2 fault that you're going to have to come back tomorrow,
 3 although you might have had to come back tomorrow in any
 4 event. Is 9.30 all right for you tomorrow?
 5 A. Yes, sir .
 6 SIR JOHN SAUNDERS: Thank you.
 7 (3.46 pm)
 8 (The inquiry adjourned until 9.30 am
 9 on Thursday, 13 May 2021)

10
11
12
13
14
15
16
17
18
19
20
21
22
23
24
25

199

1 I N D E X

2

3 PC PAUL LAWTON (sworn)1
 4 Questions from MR DE LA POER1
 5 Questions from MR SMITH44
 6 Questions from MR WEATHERBY46
 7 Questions from MR HORWELL66

8

9 PC LEE MOORE (sworn)75
 10 Questions from MR GREANEY75
 11 Questions from MR WEATHERBY128

12

13 INSPECTOR MICHAEL SMITH (affirmed)141
 14 Questions from MR DE LA POER141

15
16
17
18
19
20
21
22
23
24
25

200

201